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PCB INTERIM REMEDIAL WORK PLAN ADDENDUM

BECKMAN COULTER INC.
4300 NORTH HARBOR BOULEVARD
FULLERTON, CALIFORNIA

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

POLYCHLORINATED BIPHENYL
INTERIM REMEDIAL MEASURE WORK PLAN ADDENDUM

BECKMAN COULTER, INC. FACILITY
4300 NORTH HARBOR BOULEVARD
FULLERTON, CALIFORNIA

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ACRONYMS AND ABBREVIATIONS

AOC	area of concern
BCI	Beckman Coulter, Inc.
bls	below land surface
CAM	California Administrative Manual
CEQA	California Environmental Quality Act
CHHSL	California Human Health Screening Level
CMS	Corrective Measures Study
COCs	compounds of concert
CSM	Conceptual Site Model
EDT	Evaporative Desorption Treatment
DTSC	Department of Toxic Substances Control
E2	E2 Environmental
EPA	United States Environnemental Protection Agency
H+A	Hargis + Associates, Inc.
HHRA	human health risk assessment
IRM	Interim Remedial Measure
IS/MND	Initial Study/Mitigated Negative Declaration
mg/kg	milligrams per kilogram
mm	millimeter
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PID	Photoionization detector
ppmv	parts per million by volume

ACRONYMS AND ABBREVIATIONS (continued)

RCRA	Resource Conservation and Recovery Act
RFI	RCRA Facility Investigation
RSL	regional screening level
SAP	sampling and analysis program
SCAQMD	South Coast Air Quality Monitoring District
SWPPP	Storm Water Pollution Prevention Plan
TSCA	Toxic Substances Control Act
the Site	BCI, 4300 North Harbor Boulevard, Fullerton, California
VOCs	volatile organic compounds

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1.0 INTRODUCTION

This Work Plan Addendum was prepared on behalf of Beckman Coulter Inc. (BCI) to supplement the polychlorinated biphenyl (PCB) Interim Remedial Measure (IRM) Work Plan (Hargis + Associates, Inc. [H+A], 2013c) to address all PCB-impacted soil at the BCI facility, 4300 North Harbor Boulevard, Fullerton, California (the Site) (Figure 1). This Work Plan Addendum was prepared in response to the observations and analytical results collected during implementation of the PCB IRM Work Plan (H+A, 2013c) and the Work Plan to Conduct Sub-Slab Soil Documentation and Sampling revision 2.0 (H+A, 2013d). This Addendum was recommended in the PCB Technical Memo dated February 26, 2014 prepared by H+A for BCI that was provided to the California Department of Toxic Substances Control (DTSC) and discussed at the February 28, 2014 meeting between BCI representatives and the DTSC.

The PCB IRM Work Plan was designed to address known PCB soils found at the Site and focused on two localized areas along the eastern portion of the Site; east of Building 6 and in the vicinity of Building 10; Analyses of confirmation samples from the sidewalls and floors of the PCB IRM Work Plan excavations indicates a need to expand the excavation areas (Table 1) to determine the lateral extent of PCB impacted soils. Results of this sampling also indicated that a large majority of the PCB-impacted soil was co-located with volatile organic compound (VOC) impacted soil. In addition, subsequent building demolition at the Site identified PCB-impacted soil was observed in areas other than those outlined in the PCB IRM Work Plan. This PCB IRM Work Plan Addendum has been prepared to provide a summary of all PCB data collected at the Site to delineate the full extent of PCB-impacted soil and present a plan to excavate, segregate VOC-impacted or clean soils from the PCB-impacted soil, and dispose of all PCB-impacted soil offsite. This work will be conducted pursuant to the Resource Conservation Recovery Act (RCRA) Part B Permit, issued July 28, 2006, Part VI – Corrective Action, Subsection B, Future Corrective Action, Part 2 under the oversight of the DTSC and will be included in the RCRA Facility Investigation (RFI) report and final Corrective Measures Study (CMS).

1.1 BACKGROUND

The Site occupies 45.4 acres in a mixed commercial, industrial area. Lambert Road borders the site to the north, Union Pacific Railroad tracks are to the east, Harbor Boulevard is to the west and a storm drain channel to the south (Figure 1).

The BCI Fullerton facility was a multipurpose facility that housed operations including; office, research and development (R&D), and manufacturing activities. The property is located approximately 300 feet above mean sea level. The topography in the region is relatively flat. There is a gradual 26.5 foot decline in elevation from the northeast corner of the property to the southwest corner. The improvements on the property include eight large, one or two story buildings, two smaller buildings, sheds, a carport, internal roads, parking lots and landscaping. The land was purchased by BCI in 1951 and prior to that the land was formerly used for agriculture. The first buildings (Buildings 1 and 2) were built in 1953; many buildings have been added since. By 1964, Buildings 1 through 5 and the northern portion of Building 6 were built and by 1968 the southern portion of Building 6 and Building 8 were erected. Buildings 9, 10 and 11 were erected in the 1990s.

Manufacturing activities conducted at the Site included instrument assembly, component manufacturing, hardware manufacturing, printing and reagent production. R&D activities included new product development and support for existing product lines. All of the hazardous wastes generated by the operations have been transported off-site for disposal. The elementary neutralization of rinse water from plating operations conducted in a portion of Building 6 is the only hazardous waste treatment operation ever to exist at the facility.

Investigations have been conducted at the Site since 2008 after BCI management decided to discontinue all operations and close the Fullerton facility. Discovery of VOCs in soil gas in the eastern portion of the Site was reported to the DTSC in a letter dated July 31, 2008. E2 Environmental, Inc. (E2) prepared a Phase I investigation of the Site that identified 37 Areas of Concern (AOC) (E2, 2008). Five additional AOCs (AOC 38 through AOC 42) were added in the draft Sampling and Analysis Plan (SAP) (E2, 2009; revised by H+A, 2010a) (Figure 2). Operations at the Site ceased in August 2010.

Pursuant to the ongoing RCRA Corrective Action process under the oversight of DTSC, extensive chemical and subsurface data have been collected during the RFI and the nature and extent of compounds of concern (COCs) including PCBs, has now been delineated.

The following sections describe the process in which PCB-impacted soils at the Site have been delineated, including a thorough review of all relevant analytical data, as well as introduce a PCB IRM Work Plan Addendum that details the proposed removal and disposal of all Site PCB-impacted soils.

2.0 POLYCHLORINATED BIPHENYL IMPACTED SOIL DELINEATION

The presence of PCB-impacted soil at the Site has been confirmed in numerous soil investigations. The sections below summarize these investigations as well as identify the areal and vertical extent of PCB-impacted soil at the Site.

2.1 DOCUMENTED USE OF POLYCHLORINATED BIPHENYLS

A review of BCI's environmental files indicates that there were originally twelve PCB-containing transformers on the Site with a combined capacity of 3,755 gallons of PCB-bearing fluids. A Consent Agreement and Final Order was entered into between the United States Environmental Protection Agency (EPA) and BCI on February 6, 1989 that specified annual documentation of transformer inspections, annual documentation detailing the disposition of PCB-containing waste, and that all PCB-bearing transformers be removed by the end of 1989. Six of the transformers (3, 4, 5, 6, 12, and 13) were taken out of service and removed prior to July 18, 1987. Transformers #10, 11, and 14 were removed on July 18, 1987. The three remaining transformers included 2, 7, and 8. During a September 22, 1987 inspection it was found that a very small amount PCB residue had seeped out of a valve of transformer 8. Immediately following the inspection, the PCB bearing residue was cleaned up and the rags used for the cleanup were managed as PCB contaminated material and disposed of accordingly (see Appendix A for documentation). The final three PCB bearing transformers were removed from service and transported off-site for disposal on July 1, 1989. Since this time the only known PCB-bearing material on-Site was light ballasts which have since been removed from the Site (Appendix A).

The Phase I Investigation (E2, 2008) indicated that the only AOCs in which PCBs were identified as a potential COC were in AOC 35 and AOC 37. As of 2005, all known and documented sources of PCBs at the Site had been removed and properly disposed of.

2.2 POLYCHLORINATED BIPHENYL INVESTIGATIONS

Investigations have been conducted at Site since 2008 after the BCI management announced the decision to discontinue all operations and close the Fullerton facility.

Of the 42 AOCs identified, AOCs 35 (Building 3; PCBs containing transformers) and 37 (Building 10 – bay 1; PCB containing light ballasts) were identified as areas where PCBs were used or stored (SAP, Appendix 4; H+A, 2010a). Per DTSC request (DTSC 2010), PCBs were added to the COC analyte list for selected samples at AOC 32 even though PCBs were not listed as materials used in the AOC. In addition, as part of the Part B Permit closure of the facility, the updated Closure Plan (H+A, 2011) identified that PCBs would be collected from five soil boring locations at Drum Storage Area #8, identified as AOC 33 in the SAP (H+A, 2010a) even though the PCBs were not identified on the chemical list for this AOC. As a result of the AOC 32 soil investigation a PCB IRM Work Plan was developed to excavate and profile for disposal the discovered PCB contaminated soils (H+A, 2013c). At the time, it was believed that the areal and vertical extent of PCB impacted soil was contained to sporadic areas observed east of Building 6 and in one location in Building 10. In addition to the above mentioned investigations and requests, a number of other investigations have included analysis for PCBs in soils (Figure 3). To date, characterization of PCBs has occurred during the following investigations:

- AOC 32 and 40 Soil Investigation – 2010;
- Building 3 (AOC 35) Soil Investigation – 2011;
- East of Building 6 Soil Investigation (AOC 32 only) – 2011;
- Closure Plan Sampling (AOC 33 and AOC 37) – 2012;
- PCB IRM Work Plan Implementation – 2013;
- Demolition Sub Slab Soil Investigation – 2013 and 2014;
- Phased Corrective Action Areas (CAA) Soil Investigation – 2013; and,
- PCB Delineation Trench Sampling – 2014.

The PCB investigations to date have included the following sampling approaches: (1) AOC- and Hazardous Waste Management Unit-focused based on historic information, (2) all documented former transformer locations, (3) Site-wide, including both random and sub-slab features, (4) remediation confirmation, and (5) specific PCB delineation trenching. The following briefly summarizes these investigations.

2.2.1 AOC 32 and 40 Soil Investigation

AOC 32 is adjacent to the drainage channel located east of Building 6 along the eastern boundary of the Site and AOC 40 includes the former plating shop and the adjacent area east of Building 6 (Figure 2). Previous soil gas investigations identified the presence of VOCs at AOC 32 and 40. The scope of work during this investigation included the drilling of soil borings and collection of soil samples for analysis of COCs, including PCBs, to determine if COCs have been released to soils (H+A, 2010b). Seventeen soil borings were drilled and sampled between September 20 and 23, 2010 to identify the extent of the COCs in soil in the vicinity of the drainage channel (Figure 3). At each soil boring location, soil samples were collected immediately below any paving or engineered paving base material, as well as at 5 and 10, and in some cases 15 feet below land surface (bls). At DTSC's request samples analyzed for PCBs were collected from one to two feet bls.

2.2.2 Building 3 Soil Investigation

The soil investigation in Building 3 (AOC 35) was conducted to further investigate elevated VOCs based on existing soil, soil vapor, and groundwater data from previous investigations. The soil sampling was conducted during the period of August 8 through August 16, 2011 (H+A, 2012b). The scope of work for this investigation consisted of constructing eight soil borings using direct-push sampling equipment to collect vadose zone soil samples and groundwater grab samples. The vadose zone samples were used to determine the extent of contamination in the soils. The groundwater grab samples were collected using Hydropunch methods for analysis of VOCs to determine the vertical and horizontal extent to which groundwater has been impacted beneath Building 3 (Figure 3). The groundwater grab samples were also used to supplement data from the groundwater monitoring well construction activities being conducted under the Phase II groundwater investigation. A total of 22 soil samples were collected during the Building 3 investigation at depths of 5, 10, and 20 feet bls and analyzed for the identified COCs. All soil samples collected in Building 3 were analyzed for PCBs.

2.2.3 East of Building 6 Soil Investigation

The soil investigation in the area east of Building 6 (AOCs 29, 31, and 32) was conducted to further investigate elevated VOCs based on existing soil, soil vapor, and groundwater data. The soil sampling was conducted during the period of August 8 through August 16, 2011 (H+A, 2012a). The scope included the drilling and sampling of 21 soil borings to identify the extent of the COCs in soil in the area east of Building 6 (Figure 3). Samples collected from select AOC 32 borings in the vicinity of previous PCB detections were analyzed for pesticides and PCBs at DTSC's request.

2.2.4 Closure Plan Sampling

Multiple investigations were conducted under the guise of Closure Plan activities (H+A, 2013a). Included in those activities were soil sampling in AOCs 33 (Drum Storage Area #8) and AOC 37 (Building 10) (H+A, 2013a).

Drum Storage Area #8 was used for hazardous waste storage for approximately one year (1980 to 1981) until Building 10 was constructed and became the hazardous waste storage area for the entire facility. The wastes stored in this area included manufacturing wastes and lab wastes. Five soil borings were constructed and sampled in Drum Storage Area #8 (Figure 3). A total of 17 soil samples (including two duplicates) were collected during the investigations at depths of 0.5, 3, and 6 feet bls. The soil samples were analyzed for VOCs, California Administrative Manual (CAM) 17 metals, hexavalent chromium, 1,4-dioxane, PCBs, and total cyanide (H+A, 2013a).

The Building 10 hazardous waste storage area was used for the storage and packaging of permitted and non-permitted hazardous waste. The bays that were part of the Part B permit (Bays 1 and 2) are out of service (H+A, 2013a). Nineteen soil borings were constructed and sampled in the Building 10 hazardous waste storage area. A total of 67 soil samples were collected during the investigations at depths of 0.5, 1, 2, 3, and 6 feet bls. PCBs were analyzed for in 44 of 67 total soil samples collected (H+A, 2013a).

2.2.5 Polychlorinated Biphenyl Interim Remedial Measure

Pursuant to the soil recommendations of the Draft CMS, submitted to DTSC on August 29, 2013 (H+A, 2013b) the preferred alternative for PCB-impacted soil was excavation and off-Site disposal at an appropriate, permitted facility. At the time, it was thought that PCB-impacted soil was mostly shallow and of limited expected volume, and that these soils may be addressed quickly and effectively as an IRM (H+A, 2013c).

Based on the results of previous site investigations, there were seven exceedance points east of Building 6 and one exceedance point within the footprint of Building 10 identified for soil excavation and removal (Figure 4). Initial excavation encompassed a six foot by six foot area centered on the exceedance point and proceeded to a depth of at least one foot greater than the depth of the exceedance point. Soil excavation was carried out on all identified areas in November 2013.

Prior to excavations, soil samples were collected from the perimeters of the six foot by six foot areas to determine if the excavation area needed to be increased. After excavation was complete, soil samples were collected from the sidewalls and bases of all excavations (Figures 5-10). A total of 133 soil samples were analyzed for PCBs during the PCB IRM. In addition, eight composite soil samples were collected and analyzed for PCBs, from the roll off bins where the excavated soil was stored.

During this investigation it was observed that most PCB-impacted soil could be classified as dark grey/green to black clayey silt, with slight moisture and slight odor as opposed to the brown odorless soils typically encountered in the area. A full, detailed summary of all PCB IRM activities is presented as an Appendix B.

2.2.6 Demolition Sub-Slab Soil Investigation

The scope of this investigation included inspection/documentation of sub-slab soil conditions after removal of the building foundations and asphalt areas, mapping areas of known or potential impact, and conducting near surface soil sampling at the Site (H+A, 2013d). Demolition at the Site commenced in September 2013 and was concluded in March 2014. Soil samples collected from sampling locations were analyzed for the COCs associated with the nearest AOC. Soil in trenches dug to remove service lines, drains, piping, etc. was also sampled where deemed appropriate by the methodologies introduced in the Work Plan (H+A, 2013d). Specific attention was paid to all documented former locations of PBC bearing transformers. At least four samples collected at two sample locations beneath each transformer pad were collected and analyzed for PCBs. In the case of transformer #8, eight samples were collected at four locations. A total of 135 original samples were analyzed for PCBs during the Sub-Slab Soil Investigation (Table 1).

A detailed summary of Demolition Sub-Slab activities will be presented in the upcoming RFI report.

2.2.7 Phased Corrective Action Areas Soil Investigation

The scope of this investigation conducted on November 12 and 14, 2013 was to address data gaps that were identified during a September 27, 2013 meeting between Teri Copeland & Associates and Shukla Roy-Semmen of the DTSC regarding the development of the human health risk assessment (HHRA).

The scope of soil sampling involved collecting soil matrix samples at 23 locations. Soil samples were collected just below the asphalt or concrete from 0 to 0.5 feet bls and from 2.0 to 2.5 feet bls. Per agreement with the DTSC, the soil samples collected in the parking lot areas were analyzed for CAM 17 metals, poly-aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPH). The soil samples collected in the open areas were analyzed for CAM 17 metals and organochlorine pesticides. In addition, all samples collected at 0.5 feet bls were analyzed for PCBs. A total of 23 soil samples were analyzed for PCBs during this investigation.

A full, detailed summary of all Human Health Risk Assessment (HHRA) sampling activities will be presented in the RFI report.

2.2.8 PCB Delineation Trenching

Upon discovery of wider spread PCB-impacted soil than originally thought, a trenching plan was designed to further delineate the extent of PCB-impacted soil. Trenches were excavated along east-west transects starting at the most southern occurrence of PCB-impacted soil through Building 10 and ending with the most northern occurrence of PCB-impacted soil through Building 3 (Figure 11). The trenches were dug under the supervision of the onsite geologist who was able to characterize the soil excavated from the trench as either, likely to contain PCBs (dark grey/green/black silty clay) or not likely to contain PCBs (any other type of encountered soil). The depth of the trench was determined on Site when the bottom of PCB-impacted soil was encountered. The side walls of the trench were sampled every 20 linear feet along the trench, typically at two depths, one depth just beneath the start of the indicative soil and one beneath the bottom of the indicative soil. Observations of the depths of potentially impacted PCB soils were also noted in log books. A total of 123 soil samples were analyzed for PCBs during this investigation.

As is detailed below, the data generated by this effort, in conjunction with all of the previous investigations, have been used to fully delineate the areal and vertical extent of PCB-impacted soil, to create cross sections of the impacted and non-impacted soil through the entire impacted zone, and to calculate the potential volume of PCB-impacted soil.

2.3 CHARACTERISTICS OF PCB-IMPACTED SOILS

During excavation work completed under the PCB IRM Work Plan, it was noted, and later confirmed, that most of the PCB-impacted soil could be classified as a clayey-silt with slight moisture, slight odor, and a dark grey/green to black color.

In addition, most of this soil contained sporadic pieces of broken wood and/or plastic suggesting nonnative fill material as its origin. It has also been observed that the PCB-impacted soil is generally co-located with the VOC-impacted soil in the Building 6 area. Because of these observations, this type of soil, when encountered in various locations across the Site, has been analyzed for PCBs (in addition to the regularly scheduled analyte list for each particular area). The results can be summed up as "all PCB bearing soil can be classified as the black/dark grey/green clayey silt, but not all black/dark grey/green clayey silt soil types encountered contain PCBs".

2.4 PCB CLEANUP LEVEL

BCI plans to remediate to unrestricted residential use in the areas of PCB-impacted soil. The California Human Health Screening Level (CHHSL) for total PCBs in soil is 0.089 milligrams per kilogram (mg/kg); however, the EPA has established residential Regional Screening Levels (RSLs) of 0.22 mg/kg for PCBs as Aroclor 1242, Aroclor 1248, Aroclor 1254, or Aroclor 1260. This RSL value is equal to the CHHSL adjusted from a 100% dermal absorption to a 15% dermal absorption value, per the DTSC Preliminary Endangerment Assessment Guidance Manual, Appendix A, Table 2 (California EPA/DTSC, 1994). Note that PCBs as Aroclor 1016, Aroclor 1221, or Aroclor 1232 have not been detected at the Site. Based on the proposed residential land use and the residential RSL value for PCBs, the cleanup level for PCB-impacted soil at the Site has been established as 0.22 mg/kg.

2.5 SUMMARY OF PCB RESULTS

As noted above, eight soil investigations have been carried out that, in part, considered PCBs as a potential compound of concern. A total of 618 soil samples have been analyzed for PCBs as Aroclors 1016, 1221, 1232, 1242, 1248, 1254, and 1260 to date. Two hundred fourteen (214) soil samples contained one or more of the PCB Aroclors at concentrations above detection limits (Table 1). One hundred sixty three (163) soil samples contained one or more Aroclor at concentrations above the established cleanup level. The most common Aroclors detected are 1254, and 1260. Aroclors 1016, 1221, and 1232 have not been detected in soils at the Site.

Of the 618 total samples, only two had total PCB concentrations greater than the EPA Toxic Substance Control Act (TSCA) threshold limit of 50 mg/kg. The two samples exceeding the TSCA threshold were 32-B024-2.0 (and QC duplicate sample) and AOC-B08-001 (Table 1).

Both of these samples were located in the east of Building 6 area and have been excavated and stored in a bin as part of the initial phase of PCB IRM Work Plan implementation.

The following sections provide a brief summary of the results of sampling and analysis for PCBs across the Site.

2.5.1 AOC 32 and 40 Soil Investigation – PCB Results

Forty six soil samples collected at a depth between one and 20 feet bls were analyzed for PCBs during the AOC 32 and 40 Soil Investigation. Of the forty six soil samples collected four had a detection of one or more Aroclor at a concentration greater than detection limits all located within AOC 32. Three of those locations had a detection of one or more Aroclor at a concentration greater than the cleanup level. One location, AOC32-B08-1.0, had a detection of Aroclor 1254 at a concentration of 63 mg/kg, greater than the TSCA threshold limit (Table 1, Figure 3).

2.5.2 Building 3 Soil Investigation – PCB Results

Twenty four soil samples were analyzed for PCBs as part of the Building 3 Soil Investigation. Samples were collected at depths of 5, 10, and 20 feet bls. No PCB Aroclor was detected above its detection limit in any soil sample collected during the Building 3 Soil Investigation (Table 1, Figure 3).

2.5.3 East of Building 6 Soil Investigation – PCB Results

Fourteen soil samples collected at depths between 5 and 20 feet bls were analyzed for PCBs during the East of Building 6 Soil Investigation. Of the fourteen soil samples collected, two had a detection of one or more Aroclor at a concentration greater than detection limits. One of those locations had a detection of one or more Aroclor at a concentration greater than the cleanup level (Table 1, Figure 3).

2.5.4 Closure Plan Sampling – PCB Results

Sixty one soil samples collected at depths between 0.5 and six feet bls were analyzed for PCBs during the Closure Plan Sampling. Of the sixty one soil samples collected, six had a detection of one or more Aroclor at a concentration greater than detection limits, all in the Building 10 area. Of those locations only one had a detection of one or more Aroclor at a concentration greater than the cleanup level (Table 1, Figure 3).

2.5.5 PCB IRM – PCB Results

During PCB IRM Work Plan implementation, 133 samples were collected and analyzed for PCBs. One hundred twelve samples contained one or more PCB Aroclor at concentrations above detection limits.

Ninety samples contained one or more Aroclor at a concentration greater than the cleanup level (Table 1, Figures 3 and 5-10). One sample location (32-B024) had a total PCB concentration greater than the TSCA threshold limit concentration of 50 mg/kg (Table 1).

2.5.6 Demolition Sub-Slab Soil Investigation – PCB Results

During the Demolition Sub-Slab Soil Investigation, 144 samples were collected and analyzed for PCBs. Thirty one samples contained one or more PCB Aroclor at concentrations above detection limits. Twenty three samples contained one or more Aroclor at a concentration greater than the cleanup level (Table 1, Figure 3).

Of the 144 total samples collected, 44 samples at 22 locations were collected beneath former transformer pads. One detection of a PCB Aroclor greater than the cleanup level was observed beneath Transformer #4 at 0.5 feet bls (Figure 3). The concentration was 0.320 mg/kg. The sample collected directly beneath this sample at 2.5 feet bls had no detections of PCBs.

2.5.7 Phased Corrective Action Area Soil Investigation – PCB Results

PCBs were analyzed for in 23 shallow (0.5 feet bls) samples collected during the Phased CAA Soil Investigation (Table 1). Of the 23 soil samples collected only one sample (P06-B002-0.5) contained one or more Aroclor at concentrations greater than detection limits (Table 1). The detection of Aroclor 1254 at P06-B002-0.5 was 0.29 mg/kg (Figure 3).

2.5.8 PCB Delineation Trenching – PCB Results

PCBs were analyzed for in 123 soil samples collected during PCB Delineation Trenching (Table 1). Of the 123 soil samples collected 50 samples contained one or more Aroclor at concentrations greater than detection limits (Table 1). Of those samples, 40 contained one or more Aroclor at concentrations greater than the established cleanup level (Figures 3, 11, and 12).

2.6 ORIGIN OF PCB-IMPACTED SOIL

A review of available historical records (Appendix A), observation of soil conditions, and results of recent sampling conducted underneath former transformer locations suggest a PCB release from a leaky transformer is not the source of PCBs in the soil in the Building 6 area.

All PCB bearing transformers and materials historically used at the Site have been removed and disposed of appropriately offsite. Sampling results from beneath all transformer pads indicate one detection of PCBs (0.320 mg/kg) at 0.5 feet bls beneath Transformer 4. These observations support the updated CSM that soil used as fill material during the construction of Building 6 and surrounding areas included a layer of PCB-impacted soil that was spread beneath and incorporated in native soils in this area.

Although the mechanism of placement of these contaminated soils is thought to be associated with fill materials used for the construction of Building 6 and surrounding areas, the specific source of PCB-impacts encountered at these locations is unknown.

2.7 EXTENT OF PCB-IMPACTED SOIL

Data from the Site investigations described above have defined the areal and vertical extent of PCB-impacted material at the Site based on the cleanup level of 0.22 mg/kg (Figure 11).

The approximate areal extent of PCBs is primarily in the vicinity of and east of Building 6. The northern end of the areal extent of PCB-impacted soil extends approximately 80 feet north of Building 6, but appears to be confined to areas east of Building 3. The southern end of the areal extent of PCB-impacted soil extends approximately 120 feet south of Building 6, but appears to be confined to areas north of Building 10. There were also two separate areas observed during soil investigations, one within Building 10 and one beneath transformer #4.

2.7.1 Building 10 Area

The area within Building 10 was identified during Closure Plan sampling in 2012. One detection of Aroclor 1254 was observed in a sample collected at 0.5 feet bls. All other samples collected at this location (BLD10-B024) deeper than 0.5 feet bls showed very low detections of PCBs greater than detection limits, but substantially less than the cleanup level (Table 1). This area was included as one of the original PCB IRM excavation areas and was excavated to approximately 1.5 feet deep in a 36 square foot box centered on the original exceedance point. Subsequent confirmation sampling of the excavation yielded one location (BL10-B031) where Aroclors 1254 and 1260 were detected at concentrations greater than the cleanup level at 0.5 bls (Figure 10).

2.7.2 Transformer #4 Area

The area beneath transformer #4 (Figure 11) was identified during Demolition Sub-Slab sampling in 2014. One detection of Aroclor 1260 was observed in a sample collected at 0.5 feet bls. All other samples collected at this location (DSS-B168) deeper than 0.5 feet bls showed no detections of PCBs greater than detection limits (Table 1).

2.7.3 Building 6 Area

The vertical extent of PCB-impacted soil within the area in the vicinity of Building 6 varies greatly. PCB-impacted soils have been observed anywhere between 0.5 feet bls and 13.5 feet bls (Figure 12). There appears to be a significant amount of non PCB-impacted soil resting above the impacted soil in some areas, where in other areas the PCB-impacted soil is very near to the surface. As part of the analysis of all of the collected data, cross sections were prepared to help illustrate the full vertical extent of PCB-impacted soil in the area (Figure 12). Interpretation of these data, in conjunction with what has been observed in the field and all of the analytical results, indicates that the extent of PCB-impacted material is on average, approximately three feet thick. The approximate volume of PCB-impacted soil based on estimated thickness and areal measurements is approximately 16,600 tons.

The Site-wide HHRA sampling and demolition sub-slab investigation conducted under close DTSC oversight did not yield PCB detections outside of the areas described above and confirm that the PCBs impacts are limited to these defined areas. As noted above, only one PCB detection has been reported to be from a known, former transformer location, and BCI disposed of all PCB-bearing oils by the end of 1989 under a Consent Agreement and Final Order with EPA. The data generated from multiple sampling approaches outlined above are consistent with the Conceptual Site Model (CSM) statement that these impacts are related to preparation, grading, and fill material for used during building construction. It should also be re-iterated that while the mechanism for the placement of the PCB-impacted soil has been conceptually identified, the origin of the PCB-impacted soil is still unknown.

3.0 IRM CORRECTIVE ACTION PLAN

The elements of this plan were prepared pursuant to 40 CFR §761.61(a). This document serves as a notification to EPA of BCI's intent to utilize a self-implementing cleanup approach for the Site. BCI believes that this is an appropriate cleanup approach since the area of PCB-impacted materials does not involve:

- Surface or ground waters;
- Sediments in marine and freshwater ecosystems;
- Sewers or sewage treatment systems;
- Private or public drinking water sources or distribution systems;
- Grazing lands, or
- Vegetable gardens.

The following sections describe the details for implementation of the PCB IRM Work Plan Addendum, including field confirmation of the extent of impacted material, excavation and segregation methods, removal and disposal methods, verification sampling, contingency actions, and Site restoration. All activities will be conducted in accordance with applicable Occupational Safety and Health Administration (OSHA) requirements and other state and local requirements and permits, including an revised grading plan and an updated California Environmental Quality Act (CEQA) Initial Study/Mitigated Negative Declaration (IS/MND) both approved by the City of Fullerton.

3.1 EXCAVATION AND SEGREGATION

It is BCI's intent to remove all soil impacted by PCBs at concentrations greater than the cleanup level of 0.22 mg/kg off Site. It is also BCI's intent to segregate and treat any VOC only impacted soil onsite with the evaporative desorption treatment (EDT) technology currently operating at the Site under a DTSC-approved pilot test. To accomplish this, the plan outlined below was developed to carefully excavate and segregate the PCB-impacted and non PCB-impacted soil.

3.1.1 Delineation and Excavation

Excavation activities will begin by removing any identified non PCB-impacted soil that is lying on top of the PCB-impacted soil in the designated area (Figures 11 and 12). Excavating equipment will scrape off the top layers of soil and stockpile it adjacent to the excavation area on a 10 millimeter (mm) reinforced polyethylene liner. The onsite field geologist or engineer will confirm the presence and areal extent of PCB-impacted material based on soil type, appearance, and odor once the top soil has been removed. It is anticipated that non PCB-impacted overburden soil is on average one foot thick. However, this thickness may range between 0 and 6 feet (Figure 12).

Once the surface of the PCB-impacted material has been exposed and confirmed in the field by the onsite geologist or engineer, excavating equipment will begin to remove the PCB-impacted soil. Based on *in situ* soil samples collected during prior soil investigations (Table 1), the PCB-impacted region will be divided into TSCA and non-TSCA PCB-impacted areas (Figure 11). Areas where *in situ* sampling indicate total PCB concentrations greater than 50 mg/kg are designated as a TSCA PCB-impacted area and will be excavated and directly loaded into trucks for transport to a TSCA chemical waste landfill for disposal. Non-TSCA PCB-impacted areas will be excavated and stockpiled adjacent to the excavation area on a 10 mm reinforced polyethylene liner where they will be sampled to confirm total PCBs less than 50 mg/kg then transported to an appropriate landfill for disposal. Excavation of PCB-impacted soil will continue until all visual evidence has been removed. It is anticipated that the average thickness of the PCB-impacted soil is approximately three feet; however, the thickness of PCB-impacted material can range anywhere from 0.5 feet to 13.5 feet.

In addition to the excavation activities in the vicinity of Building 6, two small areas, one in Building 10, and one beneath transformer #4 will also be scheduled for shallow excavations (Figure 11). Both areas had detections of soil impacted by PCBs at concentrations greater than the cleanup level occurred at 0.5 feet bls. Both the these excavation areas are scheduled to be approximately 100 square feet in area, centered on the exceedance point and approximately 1.5 feet in depth. Soil excavated from these locations will be placed in the non-TSCA, PCB-impacted stockpile awaiting offsite transport and disposal.

3.1.1.1 Excavation Monitoring and Safety

During excavation activities, engineering controls such as clean water mist spray will be used for dust control as needed. Excavation will continue until the extent of the excavation is reached. When the excavation depth has reached four feet proper shoring or sloping will be utilized for safety.

Yellow caution barricade tape will be placed around the excavation areas any time the work area is left unattended. Equipment and materials will be stored inside the barricaded area to secure them after hours. In addition the soil stockpiles located adjacent to the excavation will act as a barrier to the excavation.

During excavations activities, the contractor will be careful not to disturb any of the monitoring wells in the excavation area. Since the groundwater in this area of the Site is located at approximately 15-20 feet bls, groundwater should not be encountered during these excavation activities. However, in the unlikely event that groundwater or other liquids are encountered in any of the excavations during the removal activities, the liquids will be managed by controlling the source, if possible.

Standing liquids will be pumped into an appropriately sized container. If multiple types of liquids are found, samples of each liquid type will be collected and submitted to Test America laboratory for analysis. The sample will be analyzed for the COCs expected for the area where the liquid was encountered. Based on the analytical results of each liquid sample, the liquids will be managed appropriately. If the source of the liquids cannot be controlled, excavation efforts will cease in the area and an action plan will be developed with DTSC.

Air monitoring for VOCs will be performed during site excavation activities in accordance with South Coast Air Quality Management District (SCAQMD) Rule 1166 requirements. If VOC-contaminated soil, as defined under Rule 1166 (photoionization detector [PID] readings in excess of 50 parts per million by volume (ppmv) in the air above the soil), is encountered during site excavation, the SCAQMD will be notified and a written record of the monitoring results will be transmitted to the SCAQMD within five days following the completion of site excavation activities.

All necessary storm water diversion will be maintained around excavations and stockpile areas in accordance with the Site Storm Water Pollution Prevention Plan (SWPPP).

3.2 CHARACTERIZATION OF STOCKPILED SOILS

All stockpiles will be kept to 500 cubic yards or less to facilitate sampling and expedite loading. Two types of soil will be stockpiled during this action plan:

- Non PCB-impacted overburden soil and
- Non TSCA PCB-impacted soil.

Overburden soil will sampled and analyzed for PBCs by collecting a four-point composite sample at a sampling frequency of four samples for the first 1,000 cubic yards and then one sample every 500 cubic yards after that. All samples will be extracted using EPA method 3550C (sonication), cleaned up using EPA method 3665A (sulfuric acid), and analyzed for total PCBs and individual Aroclors using EPA method 8082A by Test America, Irvine for analysis. Rapid turnaround time will be requested for these samples which will allow for quick confirmation that the overburden soil is not impacted by PCBs and for quick onsite treatment using the EDT technology.

Stockpiled, non-TSCA PCB-impacted, soil waiting for transport and disposal off-site will be sampled at a frequency of four samples for the first 1,000 cubic yards and then one sample every 500 cubic yards after that to confirm all concentrations are less than the TSCA threshold limit. A four-point composite sample will be collected at the specified sampling frequency. All samples will be extracted using EPA method 3550C (sonication), cleaned up using EPA method 3665A (sulfuric acid), and analyzed for total PCBs and individual Aroclors using EPA method 8082A by Test America, Irvine for analysis. In addition to the analysis described above, all stockpiled soil scheduled for offsite transportation and disposal will be analyzed for any analytes, parameters and analytical methods required by the disposal facility. Copies of analytical laboratory results will be provided to the disposal facility, as required.

3.3 TRANSPORTATION AND DISPOSAL OF STOCKPILED SOILS

All excavated PCB-impacted soil will be transported to an off-Site permitted disposal facility. All transportation activities will be conducted in accordance with Department of Transportation Hazardous Materials Regulations in 49 CFR parts 171 through 180 and the CEQA IS/MND.

3.3.1 CEQA

A CEQA IS/MND was completed for the BCI Facility Demolition and Remediation Project in August 2013 and approved by the City of Fullerton in September 2013. Based on the increased volume of PCB-impacted soil and corresponding increase in truck trips for off-Site disposal that is required, the air emission calculations were reanalyzed by BCI's CEQA consultant, BonTerra Psomas (Appendix C).

Based on the CEQA IS/MND update memorandum (Appendix C), the air quality analysis shows that the maximum daily emission rate of oxides of nitrogen (NO_x), the pollutant of concern, would not exceed the SCAQMD CEQA threshold, if truck haul trips do not exceed 17 round trips per day and on-site equipment during implementation of this work and is limited to 2 excavators, 2 loaders and

2 off-highway trucks, or the equivalent of this equipment, each operating for a maximum of 20 hours per day during days in which PCB-impacted soil is transported off-Site. This impact would be less than significant, consistent with the conclusions of the IS/MND, and no new mitigation measures beyond those identified in the IS/MND are required.

3.3.2 Disposal

PCB-impacted soil with concentrations below the TSCA threshold limit concentration of 50 mg/kg may be disposed of in a municipal waste landfill or equivalent, in accordance with the landfill-specific waste acceptance criteria. PCB-impacted soil at concentrations exceeding 50 mg/kg will be disposed of in a TSCA chemical waste landfill.

Appropriate off-Site disposal facilities may include:

- RCRA Subtitle D (or California Class II or Class III) landfills for soil exceeding PCB cleanup level of 0.22 mg/kg but below 50 mg/kg;
- TSCA chemical waste landfill for soil containing PCBs at concentrations greater than 50 mg/kg.

The following landfills have been identified for potential non-TSCA PCB-impacted soil disposal:

- Orange County Municipal Landfill Olinda Alpha, located in Brea, California;
- Simi Valley Landfill (California Class III) located in Simi Valley, California;
- Chiquita Canyon Landfill (California Class III) located in Castaic, California;

The following landfills have been identified for potential TSCA PCB-impacted soil disposal:

- US Ecology Landfill (Subtitle C with TSCA permit, with VOC treatment processes to meet Land Disposal Restrictions, if necessary) located in Beatty, Nevada.

As noted above, all soil excavated from identified TSCA PCB-impacted areas will be directly loaded into trucks and transported to US Ecology Landfill. Stockpiled soils from the non-TSCA PCB-impacted areas with confirmed composite sample concentrations of total PCBs less than the TSCA threshold of 50 mg/kg will be loaded onto trucks and transported to the chosen disposal facility in accordance will all applicable local, state, and federal regulations.

3.4 VERIFICATION/CONFIRMATION SAMPLING

Verification sampling will be conducted once the excavations reach the anticipated depths where non-impacted soil is present. Verification sampling will be conducted in each excavated area following those techniques outlined in 40 CFR §761.61 Subpart O (10-foot grid sampling).

Verification sample locations will be biased towards physical observations of contamination such as staining or odor. The verification samples will be extracted using EPA method 3550C (sonication), cleaned up using EPA method 3665A (sulfuric acid), and analyzed for total PCBs and individual Aroclors using EPA method 8082A. These methods are the same as used during previous site characterizations. All verification samples will be transported to Test America Laboratories, Inc. in Irvine, California under chain-of-custody. In addition, every tenth sample will be analyzed for VOCs to facilitate VOC remedial activities. Verification samples will be analyzed on a 24-hour rush basis so that removal actions can progress as quickly as possible.

Verification soil samples will be collected only after it is confirmed that the sidewalls of the excavation are appropriately sloped or shored for safety. If this is not the case, soil samples will be collected using excavation equipment. Physical observations of contamination such as staining or odors will be documented. All verification sample locations will be recorded in a log book and saved on a handheld GPS unit.

3.5 CONTINGENCY

In the event that initial verification sampling results indicate that soil containing PCBs at concentrations greater than the cleanup level are still present at the Site, additional excavation and verification sampling will be conducted. Additional excavation will be conducted until the PCBs are less than the cleanup level in verification samples.

3.6 RESTORATION

Once verification sampling is complete and the analytical results indicate that PCB-impacted soil has been removed, the excavations will be left open for subsequent VOC remediation activities, if applicable. Barricades around the excavated areas and/or protective covers will be provided. Storm water diversion will be maintained around open excavations in accordance with the Site Storm Water Pollution Prevention Plan. The Site will be re-graded and prepared for development subsequent to the transfer of the property to City Ventures for the proposed mixed-use redevelopment of the property.

4.0 REPORTING

A summary report will be prepared and submitted to DTSC upon completion of the work outlined in this PCB IRM Work Plan Addendum for review. The report will include a summary of all field activities including the amount of impacted materials removed, documentation of any changes to the PCB IRM Work Plan Addendum, tables summarizing verification sample results, figures showing the extent of material removed, waste manifests, laboratory reports, and all other relevant data and information. It is anticipated that the summary report will be submitted to DTSC approximately 45 days after completion of all field work.

5.0 SCHEDULE

The field work outlined in this PCB IRM Work Plan Addendum will commence upon approval from DTSC. It is anticipated that excavation and segregation activities will take approximately four weeks and that hauling of PCB-impacted material to the appropriate off-site facility or facilities will take an additional 30 weeks based on the trucking limits established in the California Environmental Quality Act (CEQA) Initial Study. Verification samples will be collected concurrently with waste hauling activities. It is anticipated that the summary report will be submitted to DTSC for review approximately 45 days after field work has been completed.

6.0 CERTIFICATION

This section serves to certify that all summary reports, sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB contamination at the Site, are on file at the location designated below, and are available for EPA or State inspection pursuant to 40 CFR Section 761.61(a)(3)(E).

Location of Records: Beckman Coulter, Inc.
250 South Kraemer Boulevard
Brea, California 92821-6232
Phone: (714) 993-5321 or (800) 526-3821

Owner of the Property (Beckman Coulter, Inc.):

Mr. Gabriel B. Compton
Director Environmental Health, Safety
& Product Compliance Engineering

06.19.2014
Date

Party Representing the Company Conducting the Cleanup (Hargis + Associates, Inc.):

Mr. Michael R. Long P.G.
Principal Hydrogeologist

06-19-2014
Date

7.0 REFERENCES

California EPA/DTSC, 1994. Preliminary Endangerment Assessment Guidance Manual, Appendix A, Table 2, January, 1994.

_____, 2010, Letter from William Jeffers, P.E., Project Manager, Brownfields and Environmental Remediation Program, DTSC to Mr. Larry Johnson, Manager, Beckman Coulter, Inc. Re: Response to Work Plan to Conduct Soil Investigation at AOC 32, dated July 9, 2010.

E2 Environmental (E2), 2008. Draft Phase 1 Environmental Site Assessment. Prepared for Beckman Coulter, Inc. Fullerton Facility. July 9, 2008.

Hargis + Associates, Inc. (H+A), 2010a. Revised Sampling and Analysis Plan (Draft) for Beckman Coulter, Inc., Fullerton Project, 4300 Harbor Boulevard, Fullerton, California; prepared by Hargis + Associations, Inc., draft dated August 5, 2010.

_____, 2010b. Areas of Concern 32 and 40 Soil Sampling Summary Report. 4300 Harbor Boulevard, Fullerton, California; prepared by Hargis + Associations, Inc., December 27, 2010.

_____, 2011. Updated Closure Plan - Revision C. 4300 Harbor Boulevard, Fullerton, California; prepared by Hargis + Associations, Inc., December 31, 2011.

_____, 2012a. Draft East of Building 6 Sampling Summary Report. 4300 Harbor Boulevard, Fullerton, California; prepared by Hargis + Associations, Inc., January 4, 2012.

_____, 2012b. Draft Building 3 Sampling Summary Report. 4300 Harbor Boulevard, Fullerton, California; prepared by Hargis + Associations, Inc., January 4, 2012.

_____, 2013a. Closure Plan Report, Beckman Coulter, Inc., 4300 Harbor Boulevard Fullerton, California. May 16, 2013.

_____, 2013b. Draft Corrective Measures Study, Beckman Coulter, Inc., 4300 N. Harbor Boulevard, Fullerton, California. August 29, 2013.

_____, 2013c. Polychlorinated Biphenyl Interim Remedial Measure Work Plan, Beckman Coulter, Inc., 4300 N. Harbor Boulevard, Fullerton, California. October 18, 2013.

_____, 2013d. Work Plan to Conduct Sub-Slab Soil Documentation and Sampling revision 2.0, Beckman Coulter, Inc., 4300 N. Harbor Boulevard, Fullerton, California. November 18, 2013.

TABLE

HARGIS + ASSOCIATES, INC.

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
AOC32-B001	AOC32-B01-001	AOC 32 Soil Investigation	9/22/2010	1.0	<1	<1	<1	**7.7J**	<1	**0.32J**	**0.19J**	**8.21**
AOC32-B002	AOC32-B02-001	AOC 32 Soil Investigation	9/22/2010	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC32-B003	AOC32-B03-001	AOC 32 Soil Investigation	9/22/2010	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC32-B004	AOC32-B04-001	AOC 32 Soil Investigation	9/22/2010	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC32-B005	AOC32-B05-001	AOC 32 Soil Investigation	9/22/2010	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC32-B006	AOC32-B06-002	AOC 32 Soil Investigation	9/21/2010	2.0	<0.05	<0.05	<0.05	<0.05	**0.28J**	**0.23J**	<0.05	**0.51**
AOC32-B007	AOC32-B07-002	AOC 32 Soil Investigation	9/21/2010	2.0	<0.05	<0.05	<0.05	<0.05	**0.055J**	**0.11J**	<0.05	**0.165**
AOC32-B008	AOC32-B08-001	AOC 32 Soil Investigation	9/21/2010	1.0	<5	<5	<5	<5	**34J**	**63J**	<5	**97**
AOC40-B001	AOC40-B01-012	AOC 40 Soil Investigation	9/21/2010	12.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B001	AOC40-B01-015	AOC 40 Soil Investigation	9/21/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B001	AOC40-B01-020	AOC 40 Soil Investigation	9/21/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B002	AOC40-B02-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B002	AOC40-B02-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B002	AOC40-B02-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B002	AOC40-B02-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B003	AOC40-B03-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B003	AOC40-B03-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B003	AOC40-B03-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B003	AOC40-B03-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B004	AOC40-B04-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B004	AOC40-B04-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B004	AOC40-B04-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B004	AOC40-B04-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B005	AOC40-B05-005	AOC 40 Soil Investigation	9/21/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B005	AOC40-B05-010	AOC 40 Soil Investigation	9/21/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B005	AOC40-B05-015	AOC 40 Soil Investigation	9/21/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B005	AOC40-B05-020	AOC 40 Soil Investigation	9/21/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B005	Q40-B05-005	AOC 40 Soil Investigation	9/21/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B006	AOC40-B06-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B006	AOC40-B06-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B006	AOC40-B06-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B006	AOC40-B06-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B007	AOC40-B07-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B007	AOC40-B07-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B007	AOC40-B07-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B007	AOC40-B07-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B008	AOC40-B08-005	AOC 40 Soil Investigation	9/21/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B008	AOC40-B08-010	AOC 40 Soil Investigation	9/21/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B008	AOC40-B08-015	AOC 40 Soil Investigation	9/21/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B008	AOC40-B08-020	AOC 40 Soil Investigation	9/21/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B008	Q40-B08-005	AOC 40 Soil Investigation	9/21/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B009	AOC40-B09-005	AOC 40 Soil Investigation	9/20/2010	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B009	AOC40-B09-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B009	AOC40-B09-015	AOC 40 Soil Investigation	9/20/2010	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

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Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
AOC40-B009	AOC40-B09-020	AOC 40 Soil Investigation	9/20/2010	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC40-B009	Q40-B09-010	AOC 40 Soil Investigation	9/20/2010	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B011	BL03-B011-20	Building 3 Soil Investigation	8/16/2011	20.0	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	ND
BL03-B011	PL-542-081611	Building 3 Soil Investigation	8/16/2011	20.0	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	ND
BL03-B012	BL03-B012-05	Building 3 Soil Investigation	8/9/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B012	BL03-B012-10	Building 3 Soil Investigation	8/9/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B012	BL03-B012-20	Building 3 Soil Investigation	8/9/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B013	BL03-B013-05	Building 3 Soil Investigation	8/10/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B013	BL03-B013-10	Building 3 Soil Investigation	8/10/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B013	BL03-B013-20	Building 3 Soil Investigation	8/10/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B014	BL03-B014-05	Building 3 Soil Investigation	8/15/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B014	BL03-B014-10	Building 3 Soil Investigation	8/15/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B014	BL03-B014-20	Building 3 Soil Investigation	8/15/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B015	BL03-B015-05	Building 3 Soil Investigation	8/9/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B015	BL03-B015-10	Building 3 Soil Investigation	8/9/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B015	BL03-B015-20	Building 3 Soil Investigation	8/9/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B016	BL03-B016-05	Building 3 Soil Investigation	8/9/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B016	BL03-B016-10	Building 3 Soil Investigation	8/9/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B016	BL03-B016-20	Building 3 Soil Investigation	8/9/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B016	PL-532-0809	Building 3 Soil Investigation	8/9/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B017	BL03-B017-05	Building 3 Soil Investigation	8/15/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B017	BL03-B017-10	Building 3 Soil Investigation	8/15/2011	10.0	<0.096	<0.096	<0.096	<0.096	<0.096	<0.096	<0.096	ND
BL03-B017	BL03-B017-20	Building 3 Soil Investigation	8/15/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B018	BL03-B018-05	Building 3 Soil Investigation	8/15/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B018	BL03-B018-10	Building 3 Soil Investigation	8/15/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL03-B018	BL03-B018-20	Building 3 Soil Investigation	8/15/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B001	33-B001-0.5	Closure Plan Sampling	10/26/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B001	33-B001-3.0	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B001	33-B001-6.0	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B002	33-B002-0.5	Closure Plan Sampling	10/26/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B002	33-B002-3.0	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B002	33-B002-6.0	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B003	33-B003-0.5	Closure Plan Sampling	10/26/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B003	33-B003-3.0	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B003	33-B003-6.0	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B003	PL-522-102612	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B004	33-B004-0.5	Closure Plan Sampling	10/26/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B004	33-B004-3.0	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B004	33-B004-6.0	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B005	33-B005-0.5	Closure Plan Sampling	10/26/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B005	33-B005-3.0	Closure Plan Sampling	10/26/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B005	33-B005-6.0	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
AOC 33-B005	PL-521-102612	Closure Plan Sampling	10/26/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B026-SS	BL010-B019-0.5	Closure Plan Sampling	10/22/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
BLD10-B026-SS	BL010-B019-1.0	Closure Plan Sampling	10/22/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B026-SS	BL010-B019-3.0	Closure Plan Sampling	10/22/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B026-SS	BL010-B019-6.0	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B026-SS	PL-503-102212	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B027-SS	BL010-B020-0.5	Closure Plan Sampling	10/22/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B027-SS	BL010-B020-1.0	Closure Plan Sampling	10/22/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B027-SS	BL010-B020-3.0	Closure Plan Sampling	10/22/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B027-SS	BL010-B020-6.0	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B027-SS	PL-504-102212	Closure Plan Sampling	10/22/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B028-SS	BL010-B021-0.5	Closure Plan Sampling	10/22/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B028-SS	BL010-B021-1.0	Closure Plan Sampling	10/22/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B028-SS	BL010-B021-3.0	Closure Plan Sampling	10/22/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B028-SS	BL010-B021-6.0	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B029-SS	BL010-B022-0.5	Closure Plan Sampling	10/22/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1**	<0.05	**0.1**
BLD10-B029-SS	BL010-B022-1.0	Closure Plan Sampling	10/22/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B029-SS	BL010-B022-3.0	Closure Plan Sampling	10/22/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B029-SS	BL010-B022-6.0	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B029-SS	PL-505-102212	Closure Plan Sampling	10/22/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B030-SS	BLD10-B023-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.057**	<0.05	**0.057**
BLD10-B030-SS	BLD10-B023-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B030-SS	BLD10-B023-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B030-SS	BLD10-B023-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B031-SS	BLD10-B024-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.25	<0.25	<0.25	<0.25	<0.25	**0.79**	<0.25	**0.79**
BLD10-B031-SS	BLD10-B024-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.058**	<0.05	**0.058**
BLD10-B031-SS	BLD10-B024-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B031-SS	BLD10-B024-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B032-SS	BLD10-B025-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.079**	<0.05	**0.079**
BLD10-B032-SS	BLD10-B025-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B032-SS	BLD10-B025-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B032-SS	BLD10-B025-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B032-SS	PL-506-102312	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B036-SS	BLD10-B026-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B036-SS	BLD10-B026-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B036-SS	BLD10-B026-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B036-SS	BLD10-B026-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B037-SS	BLD10-B027-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.065**	<0.05	**0.065**
BLD10-B037-SS	BLD10-B027-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B037-SS	BLD10-B027-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B037-SS	BLD10-B027-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B038-SS	BLD10-B028-0.5	Closure Plan Sampling	10/23/2012	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.089**	<0.05	**0.089**
BLD10-B038-SS	BLD10-B028-1.0	Closure Plan Sampling	10/23/2012	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B038-SS	BLD10-B028-3.0	Closure Plan Sampling	10/23/2012	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BLD10-B038-SS	BLD10-B028-6.0	Closure Plan Sampling	10/23/2012	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

HARGIS + ASSOCIATES, INC.

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
05-B004	05-B004-3.0	Demolition Sub Slab Sampling	1/16/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B001	DSS-B001-0.0	Demolition Sub Slab Sampling	10/29/2013	0.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B015	DSS-B015-3.0	Demolition Sub Slab Sampling	12/17/2013	3.0	<0.25	<0.25	<0.25	<0.25	<0.25	**0.54**	<0.25	**0.54**
DSS-B029	DSS-B029-5.0	Demolition Sub Slab Sampling	11/21/2013	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B030	DSS-B030-5.0	Demolition Sub Slab Sampling	11/21/2013	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B031	DSS-B031-1.0	Demolition Sub Slab Sampling	11/21/2013	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B032	DSS-B032-0.0	Demolition Sub Slab Sampling	11/21/2013	0.0	<0.049	<0.049	<0.049	<0.049	**0.1J**	**0.2J**	**0.14J**	**0.44**
DSS-B042	DSS-B042-0.0	Demolition Sub Slab Sampling	12/4/2013	0.0	<0.052	<0.052	<0.052	<0.052	<0.052	<0.052	**0.19**	**0.19**
DSS-B042	DSS-B042-2.5	Demolition Sub Slab Sampling	12/4/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B043	DSS-B043-0.0	Demolition Sub Slab Sampling	12/4/2013	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B043	DSS-B043-2.5	Demolition Sub Slab Sampling	12/4/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B044	DSS-B044-2.5	Demolition Sub Slab Sampling	12/4/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B045	DSS-B045-2.5	Demolition Sub Slab Sampling	12/4/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B047	DSS-B047-4.0	Demolition Sub Slab Sampling	12/4/2013	4.0	<0.051	<0.051	<0.051	<0.051	<0.051	**0.082J**	<0.051UJ	**0.082**
DSS-B047	PL-505-12042013	Demolition Sub Slab Sampling	12/4/2013	4.0	<1.5	<1.5	<1.5	<1.5	<1.5	**9J**	**4.3J**	**13.3**
DSS-B056	DSS-B056-3.5	Demolition Sub Slab Sampling	12/13/2013	3.5	<0.049	<0.049	<0.049	<0.049	**0.19J**	**0.31J**	**0.23J**	**0.73**
DSS-B057	DSS-B057-3.0	Demolition Sub Slab Sampling	12/13/2013	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.14**	<0.05	**0.14**
DSS-B058	DSS-B058-3.5	Demolition Sub Slab Sampling	12/13/2013	3.5	<0.49	<0.49	<0.49	<0.49	<0.49	**1.5J**	**1.1J**	**2.6**
DSS-B059	DSS-B059-3.5	Demolition Sub Slab Sampling	12/13/2013	3.5	<0.49	<0.49	<0.49	<0.49	<0.49	**0.93J**	**0.58J**	**1.51**
DSS-B060	DSS-B060-3.5	Demolition Sub Slab Sampling	12/13/2013	3.5	<0.5	<0.5	<0.5	<0.5	<0.5	**0.74J**	**0.5J**	**1.24**
DSS-B061	DSS-B061-3.5	Demolition Sub Slab Sampling	12/13/2013	3.5	<0.5	<0.5	<0.5	<0.5	**1.6J**	**2.2J**	**1.2J**	**5**
DSS-B062	DSS-B062-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.18J**	**0.11J**	**0.29**
DSS-B063	DSS-B063-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.52J**	**0.31J**	**0.83**
DSS-B064	DSS-B064-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.049	<0.049	<0.049	**0.11J**	<0.049	**0.45J**	**0.26J**	**0.82**
DSS-B064	PL- 507-12162013	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.049	<0.049	<0.049	<0.049UJ	<0.049	**0.15J**	**0.11J**	**0.26**
DSS-B065	DSS-B065-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.25	<0.25	<0.25	<0.25	**0.37J**	**0.64J**	**0.42J**	**1.43**
DSS-B066	DSS-B066-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.05	<0.05	<0.05	<0.05	**0.13J**	**0.25J**	**0.18J**	**0.56**
DSS-B067	DSS-B067-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.15**	**0.085**	**0.235**
DSS-B068	DSS-B068-3.5	Demolition Sub Slab Sampling	12/16/2013	3.5	<0.25	<0.25	<0.25	<0.25	**0.35J**	**0.6J**	**0.33J**	**1.28**
DSS-B071	DSS-B071-3.5	Demolition Sub Slab Sampling	12/17/2013	3.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.36J**	**0.21J**	**0.57**
DSS-B073	DSS-B073-3.0	Demolition Sub Slab Sampling	12/19/2013	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B074	DSS-B074-4.0	Demolition Sub Slab Sampling	12/19/2013	4.0	<0.5	<0.5	<0.5	<0.5	**1.4J**	**2.3J**	**1.4J**	**5.1**
DSS-B074	PL-508-12192013	Demolition Sub Slab Sampling	12/19/2013	4.0	<0.25	<0.25	<0.25	<0.25	**0.73J**	**1.2J**	**0.66J**	**2.59**
DSS-B075	DSS-B075-6.0	Demolition Sub Slab Sampling	12/20/2013	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B076	DSS-B076-3.0	Demolition Sub Slab Sampling	12/20/2013	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B077	DSS-B077-0.0	Demolition Sub Slab Sampling	12/20/2013	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B078	DSS-B078-8.0	Demolition Sub Slab Sampling	12/20/2013	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B079	DSS-B079-0.5	Demolition Sub Slab Sampling	12/27/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B079	DSS-B079-2.5	Demolition Sub Slab Sampling	12/27/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B080	DSS-B080-0.5	Demolition Sub Slab Sampling	12/27/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B080	DSS-B080-2.5	Demolition Sub Slab Sampling	12/27/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B081	DSS-B081-0.5	Demolition Sub Slab Sampling	12/27/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

HARGIS + ASSOCIATES, INC.

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
DSS-B081	DSS-B081-2.5	Demolition Sub Slab Sampling	12/27/2013	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B082	DSS-B082-12	Demolition Sub Slab Sampling	12/30/2013	12.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B083	DSS-B083-13.5	Demolition Sub Slab Sampling	12/30/2013	13.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B084	DSS-B084-13	Demolition Sub Slab Sampling	12/30/2013	13.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B084	PL-509-12302013	Demolition Sub Slab Sampling	12/30/2013	13.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B085	DSS-B085-3.0	Demolition Sub Slab Sampling	1/6/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B086	DSS-B086-3.0	Demolition Sub Slab Sampling	1/6/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B087	DSS-B087-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B088	DSS-B088-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B089	DSS-B089-2.5	Demolition Sub Slab Sampling	1/7/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B090	DSS-B090-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B091	DSS-B091-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B092	DSS-B092-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B093	DSS-B093-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B094	DSS-B094-4.0	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B094	PL-510-01072014	Demolition Sub Slab Sampling	1/7/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B095	DSS-B095-2.5	Demolition Sub Slab Sampling	1/7/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B096	DSS-B096-0.5	Demolition Sub Slab Sampling	1/7/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B097	DSS-B097-0.0	Demolition Sub Slab Sampling	1/8/2014	0.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.23**	<0.049	**0.23**
DSS-B098	DSS-B098-2.5	Demolition Sub Slab Sampling	1/10/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B099	DSS-B099-8.0	Demolition Sub Slab Sampling	1/10/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B100	DSS-B100-6.0	Demolition Sub Slab Sampling	1/13/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B101	DSS-B101-4.0	Demolition Sub Slab Sampling	1/13/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B102	DSS-B102-6.0	Demolition Sub Slab Sampling	1/13/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B103	DSS-B103-8.0	Demolition Sub Slab Sampling	1/13/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B104	DSS-B104-4.0	Demolition Sub Slab Sampling	1/13/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B104	PL-513-01132014	Demolition Sub Slab Sampling	1/13/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B105	DSS-B105-8.0	Demolition Sub Slab Sampling	1/13/2014	8.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B106	DSS-B106-6.0	Demolition Sub Slab Sampling	1/14/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B107	DSS-B107-15.0	Demolition Sub Slab Sampling	1/14/2014	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B108	DSS-B108-2.0	Demolition Sub Slab Sampling	1/14/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B109	DSS-B109-4.0	Demolition Sub Slab Sampling	1/14/2014	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B110	DSS-B110-6.0	Demolition Sub Slab Sampling	1/14/2014	6.0	<0.048	<0.048	<0.048	<0.048	<0.048	<0.048	<0.048	ND
DSS-B111	DSS-B111-8.0	Demolition Sub Slab Sampling	1/14/2014	8.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B112	DSS-B112-6.0	Demolition Sub Slab Sampling	1/14/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B113	DSS-B113-0.0	Demolition Sub Slab Sampling	1/15/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B114	DSS-B114-2.0	Demolition Sub Slab Sampling	1/16/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B114	PL-514-01162014	Demolition Sub Slab Sampling	1/16/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B115	DSS-B115-2.0	Demolition Sub Slab Sampling	1/16/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B116	DSS-B116-10.0	Demolition Sub Slab Sampling	1/17/2014	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B116	DSS-B116-6.0	Demolition Sub Slab Sampling	1/17/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B117	DSS-B117-0.0	Demolition Sub Slab Sampling	1/17/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
DSS-B118	DSS-B118-0.0	Demolition Sub Slab Sampling	1/17/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B119	DSS-B119-2.0	Demolition Sub Slab Sampling	1/17/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B120	DSS-B120-2.5	Demolition Sub Slab Sampling	1/20/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B121	DSS-B121-0.0	Demolition Sub Slab Sampling	1/22/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B122	DSS-B122-0.0	Demolition Sub Slab Sampling	1/22/2014	0.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B123	DSS-B123-0.0	Demolition Sub Slab Sampling	1/22/2014	0.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B126	DSS-B126-0.0	Demolition Sub Slab Sampling	1/23/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B126	DSS-B126-2.5	Demolition Sub Slab Sampling	1/23/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B127	DSS-B127-0.0	Demolition Sub Slab Sampling	1/23/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B127	DSS-B127-2.5	Demolition Sub Slab Sampling	1/23/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B128	DSS-B128-3.0	Demolition Sub Slab Sampling	1/24/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B129	DSS-B129-3.0	Demolition Sub Slab Sampling	1/24/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B130	DSS-B130-0.0	Demolition Sub Slab Sampling	1/24/2014	0.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B131	DSS-B131-0.0	Demolition Sub Slab Sampling	1/24/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B132	DSS-B132-0.0	Demolition Sub Slab Sampling	1/24/2014	0.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B133	DSS-B133-0.0	Demolition Sub Slab Sampling	1/24/2014	0.0	<0.99	<0.99	<0.99	<0.99	**4.9**	**7.7**	<0.99	**12.6**
DSS-B134	DSS-B134-4.0	Demolition Sub Slab Sampling	1/27/2014	4.0	<1	<1	<1	<1	<1	**5.1**	**2.5**	**7.6**
DSS-B134	PL-516-01272014	Demolition Sub Slab Sampling	1/27/2014	4.0	<0.49	<0.49	<0.49	<0.49	<0.49	**2.3**	**1.1**	**3.4**
DSS-B135	DSS-B135-4.0	Demolition Sub Slab Sampling	1/27/2014	4.0	<0.25	<0.25	<0.25	<0.25	<0.25	**1.5**	**0.8**	**2.26**
DSS-B136	DSS-B136-4.0	Demolition Sub Slab Sampling	1/27/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1**	<0.05	**0.06**
DSS-B137	DSS-B137-4.0	Demolition Sub Slab Sampling	1/27/2014	4.0	<0.49	<0.49	<0.49	<0.49	<0.49	**3.2**	**1.6**	**4.8**
DSS-B138	DSS-B138-4.0	Demolition Sub Slab Sampling	1/27/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.5**	**0.3**	**0.74**
DSS-B139	DSS-B139-2.5	Demolition Sub Slab Sampling	1/28/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B140	DSS-B140-0.5	Demolition Sub Slab Sampling	1/28/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B140	DSS-B140-2.5	Demolition Sub Slab Sampling	1/28/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B141	DSS-B141-0.5	Demolition Sub Slab Sampling	1/28/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B141	DSS-B141-2.5	Demolition Sub Slab Sampling	1/28/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B142	DSS-B142-0.5	Demolition Sub Slab Sampling	1/28/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B142	DSS-B142-2.5	Demolition Sub Slab Sampling	1/28/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B143	DSS-B143-0.5	Demolition Sub Slab Sampling	1/28/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B143	DSS-B143-2.5	Demolition Sub Slab Sampling	1/28/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B144	DSS-B144-0.5	Demolition Sub Slab Sampling	1/30/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B144	PL-519-01302014	Demolition Sub Slab Sampling	1/30/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B145	DSS-B145-2.5	Demolition Sub Slab Sampling	2/3/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B145	DSS-B145-8.0	Demolition Sub Slab Sampling	2/3/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B146	DSS-B146-2.5	Demolition Sub Slab Sampling	2/3/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B147	DSS-B147-2.5	Demolition Sub Slab Sampling	2/3/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B147	DSS-B147-8.0	Demolition Sub Slab Sampling	2/3/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B148	DSS-B148-0.5	Demolition Sub Slab Sampling	2/3/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B148	DSS-B148-2.5	Demolition Sub Slab Sampling	2/3/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B149	DSS-B149-0.5	Demolition Sub Slab Sampling	2/3/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B149	DSS-B149-2.5	Demolition Sub Slab Sampling	2/3/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND

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Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
DSS-B150	DSS-B150-2.5	Demolition Sub Slab Sampling	2/4/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B151	DSS-B151-3.0	Demolition Sub Slab Sampling	2/5/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B152	DSS-B152-3.0	Demolition Sub Slab Sampling	2/5/2014	3.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B153	DSS-B153-1.0	Demolition Sub Slab Sampling	2/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B154	DSS-B154-2.0	Demolition Sub Slab Sampling	2/6/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B154	PL-521-02062014	Demolition Sub Slab Sampling	2/6/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B155	DSS-B155-0.5	Demolition Sub Slab Sampling	2/6/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B155	DSS-B155-2.5	Demolition Sub Slab Sampling	2/6/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B156	DSS-B156-0.5	Demolition Sub Slab Sampling	2/6/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B156	DSS-B156-2.5	Demolition Sub Slab Sampling	2/6/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B157	DSS-B157-3.5	Demolition Sub Slab Sampling	2/7/2014	3.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B158	DSS-B158-3.5	Demolition Sub Slab Sampling	2/7/2014	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B159	DSS-B159-0.5	Demolition Sub Slab Sampling	2/10/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B159	DSS-B159-2.5	Demolition Sub Slab Sampling	2/10/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B160	DSS-B160-0.5	Demolition Sub Slab Sampling	2/10/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B160	DSS-B160-2.5	Demolition Sub Slab Sampling	2/10/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B161	DSS-B161-3.0	Demolition Sub Slab Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B162	DSS-B162-3.0	Demolition Sub Slab Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B163	DSS-B163-3.0	Demolition Sub Slab Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B164	DSS-B164-3.0	Demolition Sub Slab Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B164	PL-522-02112014	Demolition Sub Slab Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B165	DSS-B165-4.0	Demolition Sub Slab Sampling	2/12/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B166	DSS-B166-4.0	Demolition Sub Slab Sampling	2/12/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B167	DSS-B167-0.5	Demolition Sub Slab Sampling	2/12/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	**0.082**	**0.082**
DSS-B167	DSS-B167-2.5	Demolition Sub Slab Sampling	2/12/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B168	DSS-B168-0.5	Demolition Sub Slab Sampling	2/12/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	**0.32**	**0.32**
DSS-B168	DSS-B168-2.5	Demolition Sub Slab Sampling	2/12/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B169	DSS-B169-0.5	Demolition Sub Slab Sampling	2/12/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B169	DSS-B169-2.5	Demolition Sub Slab Sampling	2/12/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B170	DSS-B170-0.5	Demolition Sub Slab Sampling	2/12/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B170	DSS-B170-2.5	Demolition Sub Slab Sampling	2/12/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B171	DSS-B171-4.0	Demolition Sub Slab Sampling	2/12/2014	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B172	DSS-B172-3.5	Demolition Sub Slab Sampling	2/12/2014	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B173	DSS-B173-4.5	Demolition Sub Slab Sampling	2/12/2014	4.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B174	DSS-B174-5.0	Demolition Sub Slab Sampling	2/12/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B174	PL-524-02122014	Demolition Sub Slab Sampling	2/12/2014	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
DSS-B175	DSS-B175-0.5	Demolition Sub Slab Sampling	2/13/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B175	DSS-B175-2.5	Demolition Sub Slab Sampling	2/13/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B176	DSS-B176-0.5	Demolition Sub Slab Sampling	2/13/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B176	DSS-B176-2.5	Demolition Sub Slab Sampling	2/13/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
DSS-B177	DSS-B177-6.0	Demolition Sub Slab Sampling	2/13/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
P06-B005	P06-B005-3.0	Demolition Sub Slab Sampling	1/15/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.24**	**0.14**	**0.38**

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
P09-B004	P09-B004-11.0	Demolition Sub Slab Sampling	1/14/2014	11.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
P09-B006	P09-B006-3.0	Demolition Sub Slab Sampling	1/15/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PNO-B008	PNO-B008-14.0	Demolition Sub Slab Sampling	1/14/2014	14.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSE-B002	PSE-B002-16.0	Demolition Sub Slab Sampling	1/17/2014	16.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PSO-B009	PSO-B009-2.5	Demolition Sub Slab Sampling	1/16/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PWE-B007	PWE-B007-7.5	Demolition Sub Slab Sampling	1/17/2014	7.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PWE-B009	PWE-B009-3.0	Demolition Sub Slab Sampling	1/16/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B010	32-B010-05	East of Building 6 Soil Investigation	8/11/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B010	32-B010-10	East of Building 6 Soil Investigation	8/11/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B010	32-B010-15	East of Building 6 Soil Investigation	8/11/2011	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B010	32-B010-20	East of Building 6 Soil Investigation	8/11/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B012	32-B012-05	East of Building 6 Soil Investigation	8/11/2011	5.0	<0.25	<0.25	<0.25	<0.25	**0.68**	**1.5**	**0.17**	**2.35**
32-B012	32-B012-10	East of Building 6 Soil Investigation	8/11/2011	10.0	<0.05	<0.05	<0.05	<0.05	**0.052**	<0.05	<0.05	**0.052**
32-B013	32-B013-05	East of Building 6 Soil Investigation	8/11/2011	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B013	32-B013-10	East of Building 6 Soil Investigation	8/11/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B013	32-B013-15	East of Building 6 Soil Investigation	8/11/2011	15.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B013	32-B013-20	East of Building 6 Soil Investigation	8/11/2011	20.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B016	32-B016-05	East of Building 6 Soil Investigation	8/10/2011	5.0	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	<0.15	ND
32-B016	32-B016-10	East of Building 6 Soil Investigation	8/10/2011	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B016	32-B016-15	East of Building 6 Soil Investigation	8/10/2011	15.0	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	ND
32-B016	32-B016-20	East of Building 6 Soil Investigation	8/10/2011	20.0	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	<0.14	ND
EDT-B009	EDT-009-3.5	EDT Confirmation Sampling	12/12/2013	3.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	<2.5	ND
EDT-B010	EDT-010-3.5	EDT Confirmation Sampling	12/12/2013	3.5	<0.05	<0.05	<0.05	<0.05	**0.25J**	**0.48J**	**0.25J**	**0.98**
EDT-B011	EDT-B011-7.0	EDT Confirmation Sampling	12/23/2013	7.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
EDT-B012	EDT-B012-11.5	EDT Confirmation Sampling	12/23/2013	1.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
EDT-B013	EDT-B013-3.0	EDT Confirmation Sampling	12/23/2013	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
EDT-B014	EDT-B014-9.0	EDT Confirmation Sampling	12/23/2013	9.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B009	29-B009-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.74J**	**1.1J**	**0.57J**	**2.41**
29-B009	29-B009-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.25	<0.25	<0.25	**1.5**	<0.25	**1.5**	**0.81**	**3.81**
29-B010	29-B010-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.5	<0.5	<0.5	<0.5	**2.5J**	**2J**	**0.89J**	**5.39**
29-B010	29-B010-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.5	<0.5	<0.5	<0.5	**1.7J**	**2.2J**	**1.2J**	**5.1**
29-B011	29-B011-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.43J**	**0.24J**	**0.67**
29-B011	29-B011-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.25	<0.25	<0.25	**0.61J**	<0.25	**0.54J**	**0.15J**	**1.3**
29-B012	29-B012-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.51	<0.51	<0.51	<0.51	<0.51	**1.5J**	**0.69J**	**2.19**
29-B012	29-B012-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.98	<0.98	<0.98	**3.9J**	<0.98	**2.8J**	**1.4J**	**8.1**
29-B013	29-B013-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.98	<0.98	<0.98	<0.98	**4.8J**	**4.2J**	**2.1J**	**11.1**
29-B013	29-B013-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<1	<1	<1	**3.8J**	<1	**4.4J**	**2.4J**	**10.6**
29-B013	PL-506-11272013	PCB IRM Confirmation Sampling	11/27/2013	2.0	<1	<1	<1	**4.9J**	<1	**6.1J**	**3.5J**	**14.5**
29-B014	29-B014-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.15	<0.15	<0.15	<0.15	**0.5J**	**0.71J**	**0.37J**	**1.58**
29-B014	29-B014-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.5	<0.5	<0.5	**2.2**	<0.5	**2.3**	**1.4**	**5.9**
29-B015	29-B015-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.25	<0.25	<0.25	**1J**	<0.25	**1.2J**	**0.7J**	**2.9**
29-B015	29-B015-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.98	<0.98	<0.98	**2.8J**	<0.98	**3.9J**	**2.2J**	**8.9**

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
29-B016	29-B016-1.0	PCB IRM Confirmation Sampling	11/27/2013	1.0	<0.25	<0.25	<0.25	**1.2J**	<0.25	**1.6J**	**0.97J**	**3.77**
29-B016	29-B016-2.0	PCB IRM Confirmation Sampling	11/27/2013	2.0	<0.25	<0.25	<0.25	**1.9J**	<0.25	**1.8J**	**0.99J**	**4.69**
29-B017	29-B017-3.0	PCB IRM Confirmation Sampling	11/27/2013	3.0	<0.25	<0.25	<0.25	**1.1J**	<0.25	**1.7J**	**0.95J**	**3.75**
29-B018	29-B018-3.0	PCB IRM Confirmation Sampling	11/27/2013	3.0	<0.049	<0.049	<0.049	**0.21J**	<0.049	**0.34J**	**0.25J**	**0.8**
31-B017	31-B017-1.5	PCB IRM Confirmation Sampling	11/13/2013	1.5	<0.5	<0.5	<0.5	<0.5	**1.2J**	**1.4J**	**0.86J**	**3.46**
31-B017E	31-B017E-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
31-B017N	31-B017N-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	**0.052J**	**0.053J**	<0.05	**0.105**
31-B017S	31-B017S-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B017W	31-B017W-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.5	<0.5	<0.5	<0.5	**0.99J**	**1.4J**	**0.79J**	**3.18**
31-B019	31-B019-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.05	<0.05	<0.05	**0.3J**	<0.05UJ	<0.05UJ	<0.05UJ	**0.3**
31-B019	PL-504-112613	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05UJ	**0.29J**	**0.55J**	**0.25J**	**1.09**
31-B020	31-B020-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.17J**	**0.25J**	**0.12J**	**0.54**
31-B021	31-B021-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<5	<5	<5	**21**	<5	**1.7**	**0.97**	**23.67**
31-B022	31-B022-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.3J**	**1.9J**	**1J**	**4.2**
31-B023	31-B023-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.1J**	**1.9J**	**1.1J**	**4.1**
31-B024	31-B024-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.9J**	**1.3J**	**0.73J**	**2.93**
31-B025	31-B025-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.45J**	**0.56J**	**0.26J**	**1.27**
31-B026	31-B026-1.0	PCB IRM Confirmation Sampling	11/26/2013	1.0	<0.49	<0.49	<0.49	<0.49	**1.8J**	**1.5J**	**1J**	**4.3**
31-B027	31-B027-2.0	PCB IRM Confirmation Sampling	11/26/2013	2.0	<0.049	<0.049	<0.049	**0.44J**	<0.049	**0.31J**	**0.16J**	**0.91**
31-B028	31-B028-2.0	PCB IRM Confirmation Sampling	11/26/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
31-B028	PL-505-112613	PCB IRM Confirmation Sampling	11/26/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B001	32-B001-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**0.54J**	**0.092J**	<0.05	**0.632**
32-B001E	32-B001E-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**1.1J**	**1.4J**	**0.59J**	**3.09**
32-B001N	32-B001N-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<1.5	<1.5	<1.5	<1.5	**7.2J**	**2J**	**0.51J**	**9.71**
32-B001S	32-B001S-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.99	<0.99	<0.99	<0.99	**11J**	**3.3J**	**1.1J**	**15.4**
32-B001W	32-B001W-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B006	32-B006-3.0	PCB IRM Confirmation Sampling	11/13/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.16**	**0.27**	**0.15**	**0.58**
32-B006E	32-B006E-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.98	<0.98	<0.98	<0.98	**9.3J**	**4.8J**	**2.6J**	**16.7**
32-B006N	32-B006N-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B006S	32-B006S-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<2.5	<2.5	<2.5	<2.5	**9.5J**	**15J**	**9J**	**33.5**
32-B006W	32-B006W-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B008	32-B008-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<1.5	<1.5	<1.5	<1.5	**8.1J**	**11J**	**4.6J**	**23.7**
32-B008E	32-B008E-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.21J**	**0.31J**	**0.13J**	**0.65**
32-B008E	PL-507-1113A	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**2.4J**	**1.6J**	**0.27J**	**4.27**
32-B008N	32-B008N-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.1J**	**0.2J**	**0.12J**	**0.42**
32-B008S	32-B008S-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.2J**	**0.34J**	**0.15J**	**0.69**
32-B008W	32-B008W-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.3J**	**1.9J**	**0.84J**	**4.04**
32-B012	32-B012-6.0	PCB IRM Confirmation Sampling	11/13/2013	6.0	<0.49	<0.49	<0.49	<0.49	**0.68J**	**1.2J**	**0.6J**	**2.48**
32-B012	PL-506-1113	PCB IRM Confirmation Sampling	11/13/2013	6.0	<2.5	<2.5	<2.5	<2.5	**4.8J**	**9.3J**	**4.2J**	**18.3**
32-B012E	32-B012E-5.0	PCB IRM Confirmation Sampling	11/13/2013	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.38**	<0.049	**0.38**
32-B012N	32-B012N-5.0	PCB IRM Confirmation Sampling	11/13/2013	5.0	<0.049	<0.049	<0.049	<0.049	**0.06J**	**0.059J**	<0.049	**0.119**
32-B012S	32-B012S-5.0	PCB IRM Confirmation Sampling	11/13/2013	5.0	<0.5	<0.5	<0.5	<0.5	**0.96**	**1.8**	**0.74**	**3.5**

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
32-B012W	32-B012W-5.0	PCB IRM Confirmation Sampling	11/13/2013	5.0	<0.05	<0.05	<0.05	<0.05	**0.13J**	**0.077J**	<0.05	**0.207**
32-B017	32-B017-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B017	32-B017-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B018	32-B018-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	**0.07J**	**0.05J**	<0.049	**0.12**
32-B018	32-B018-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.048	<0.048	<0.048	<0.048	**0.066J**	**0.13J**	**0.059J**	**0.255**
32-B019	32-B019-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	**0.29J**	**0.26J**	**0.12J**	**0.67**
32-B019	32-B019-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	**0.055J**	**0.13J**	**0.063J**	**0.248**
32-B020	32-B020-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B020	32-B020-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B020	PL-501-112513	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B021	32-B021-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B021	32-B021-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	**0.088J**	**0.15J**	**0.06J**	**0.298**
32-B022	32-B022-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B023	32-B023-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.098	<0.098	<0.098	<0.098	**0.38J**	**0.57J**	**0.22J**	**1.17**
32-B024	32-B024-2.0	PCB IRM Confirmation Sampling	11/25/2013	2.0	<12	<12	<12	<12	<12J	**83J**	**36J**	**119**
32-B024	32-B024-4.0	PCB IRM Confirmation Sampling	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.055**	<0.049	**0.055**
32-B024	PL502-112513	PCB IRM Confirmation Sampling	11/25/2013	2.0	<12	<12	<12	<12	**52J**	**80J**	**35J**	**167**
32-B025	32-B025-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<1.5UJ	<1.5UJ	<1.5UJ	**4.4J**	<1.5UJ	**0.6J**	**0.24J**	**5.24**
32-B025	32-B025-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**1.9**	**3.1**	**1.2**	**6.2**
32-B026	32-B026-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<0.5	<0.5	<0.5	**1.8J**	<0.5	**0.31J**	**0.13J**	**2.24**
32-B026	32-B026-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B027	32-B027-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<1	<1	<1	**13J**	<1	**2.5J**	**1.2J**	**16.7**
32-B027	32-B027-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<15	<15	<15	**46J**	<15	**2.3J**	**1.2J**	**49.5**
32-B028	32-B028-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<0.05	<0.05	<0.05	**0.15**	<0.05	<0.05	<0.05	**0.15**
32-B028	32-B028-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**1.3J**	**2.5J**	**1.1J**	**4.9**
32-B028	PL-503-112613	PCB IRM Confirmation Sampling	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**0.94J**	**2.1J**	**0.91J**	**3.95**
32-B029	32-B029-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<0.05	<0.05	<0.05	**0.056**	<0.05	<0.05	<0.05	**0.056**
32-B029	32-B029-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<9.9	<9.9	<9.9	**36J**	<9.9	**1.7J**	**0.94J**	**38.64**
32-B030	32-B030-1.5	PCB IRM Confirmation Sampling	11/26/2013	1.5	<0.05	<0.05	<0.05	<0.05	**0.21J**	**0.24J**	**0.13J**	**0.58**
32-B030	32-B030-2.5	PCB IRM Confirmation Sampling	11/26/2013	2.5	<0.05	<0.05	<0.05	**0.24**	<0.05	**0.24**	**0.095**	**0.575**
32-B031	32-B031-3.0	PCB IRM Confirmation Sampling	11/26/2013	3.0	<0.05	<0.05	<0.05	**0.1J**	<0.05	**0.053J**	<0.05	**0.153**
32-B032	32-B032-3.0	PCB IRM Confirmation Sampling	11/26/2013	3.0	<0.25	<0.25	<0.25	<0.25	**1.7J**	**2.2J**	**0.95J**	**4.85**
32-B033	32-B033-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.4J**	**0.68J**	**0.34J**	**1.42**
32-B033	32-B033-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<0.25	<0.25	<0.25	<0.25	**0.49J**	**0.9J**	**0.4J**	**1.79**
32-B033	32-B033-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<0.99	<0.99	<0.99	<0.99	<0.99	**13J**	**5.4J**	**18.4**
32-B034	32-B034-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.25	<0.25	<0.25	**0.97J**	<0.25	**0.76J**	**0.49J**	**2.22**
32-B034	32-B034-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<0.15	<0.15	<0.15	<0.15	**0.3J**	**0.46J**	**0.21J**	**0.97**
32-B034	32-B034-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<1	<1	<1	<1	**1.9**	**3.3**	**1.4**	**6.6**
32-B034	PL-507-12022013	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.26J**	**0.35J**	**0.17J**	**0.78**
32-B035	32-B035-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.25	<0.25	<0.25	**0.82J**	<0.25	**0.82J**	**0.4J**	**2.04**
32-B035	32-B035-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.054J**	**0.072J**	<0.05	**0.126**
32-B035	32-B035-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
32-B036	32-B036-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.05	<0.05	<0.05	0.35J	<0.05	**0.085J**	<0.05	**0.435**
32-B036	32-B036-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.15J**	**0.21J**	**0.076J**	**0.436**
32-B036	32-B036-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B037	32-B037-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.1	<0.1	<0.1	**0.56J**	<0.1	**0.44J**	**0.21J**	**1.21**
32-B037	32-B037-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<0.5	<0.5	<0.5	<0.5	**1.2J**	**1.9J**	**0.83J**	**3.93**
32-B037	32-B037-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<2.5	<2.5	<2.5	<2.5	**4.6**	**11**	**5.9**	**21.5**
32-B037	PL-508-12022013	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.099	<0.099	<0.099	<0.099UJ	**0.33J**	**0.52J**	**0.25J**	**1.1**
32-B038	32-B038-1.0	PCB IRM Confirmation Sampling	12/2/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1J**	**0.92J**	**0.49J**	**2.41**
32-B038	32-B038-3.0	PCB IRM Confirmation Sampling	12/2/2013	3.0	<2.5	<2.5	<2.5	**9J**	<2.5	**0.97J**	**0.32J**	**10.29**
32-B038	32-B038-6.0	PCB IRM Confirmation Sampling	12/2/2013	6.0	<0.5	<0.5	<0.5	<0.5	**1.4J**	**2.2J**	**1J**	**4.6**
32-B039	32-B039-7.0	PCB IRM Confirmation Sampling	12/2/2013	7.0	<0.5	<0.5	<0.5	<0.5	<0.5	**3.9J**	**1.6J**	**5.5**
32-B040	32-B040-7.0	PCB IRM Confirmation Sampling	12/2/2013	7.0	<1	<1	<1	<1	<1	**2.7J**	**1.2J**	**3.9**
BL10-B024E	BL10-B024E-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL10-B024N	BL10-B024N-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.085**	**0.059**	**0.144**
BL10-B024S	BL10-B024S-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL10-B024W	BL10-B024W-0.5	PCB IRM Confirmation Sampling	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.076J**	**0.05J**	**0.126**
BL10-B030	BL10-B030-0.5	PCB IRM Confirmation Sampling	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.067**	<0.05	**0.067**
BL10-B031	BL10-B031-0.5	PCB IRM Confirmation Sampling	12/5/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.47J**	**0.31J**	**0.78**
BL10-B031	PL-509-12052013	PCB IRM Confirmation Sampling	12/5/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.11J**	**0.073J**	**0.183**
BL10-B032	BL10-B032-0.5	PCB IRM Confirmation Sampling	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1J**	**0.067J**	**0.167**
BL10-B033	BL10-B033-0.5	PCB IRM Confirmation Sampling	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.15**	**0.11**	**0.26**
BL10-B034	BL10-B034-1.0	PCB IRM Confirmation Sampling	12/5/2013	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.11J**	**0.073J**	**0.183**
SC-02	PL-505-1113	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**1.1J**	**1.8J**	**0.86J**	**3.76**
SC-02	SC-02-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**0.67J**	**1.2J**	**0.62J**	**2.49**
SC-02E	SC-02E-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.5J**	**0.78J**	**0.42J**	**1.7**
SC-02N	SC-02N-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**1.6J**	**1.3J**	**0.62J**	**3.52**
SC-02S	SC-02S-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.61J**	**1.1J**	**0.5J**	**2.21**
SC-02W	SC-02W-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<1	<1	<1	<1	**1.8J**	**2.7J**	**1.7J**	**6.2**
SC-03	SC-03-2.0	PCB IRM Confirmation Sampling	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
SC-03E	PL-507-1113	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**2.4J**	**0.77J**	**0.37J**	**3.54**
SC-03E	SC-03E-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.27J**	**0.16J**	**0.088J**	**0.518**
SC-03N	SC-03N-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
SC-03S	SC-03S-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**0.83J**	**0.59J**	**0.22J**	**1.64**
SC-03W	SC-03W-1.0	PCB IRM Confirmation Sampling	11/13/2013	1.0	<0.49	<0.49	<0.49	<0.49	**3.1J**	**0.95J**	**0.33J**	**4.38**
PCBa-B001	PCBa-B001-4.5	PCB Trench Sampling	1/29/2014	4.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1**	**0.1**	**0.192**
PCBa-B001	PCBa-B001-5.5	PCB Trench Sampling	1/29/2014	5.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B002	PCBa-B002-2.5	PCB Trench Sampling	1/29/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B002	PCBa-B002-5.0	PCB Trench Sampling	1/29/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B003	PCBa-B003-2.5	PCB Trench Sampling	1/29/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.3**	**0.1**	**0.41**
PCBa-B003	PCBa-B003-5.5	PCB Trench Sampling	1/29/2014	5.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B004	PCBa-B004-3.0	PCB Trench Sampling	1/29/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B004	PCBa-B004-6.0	PCB Trench Sampling	1/29/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

TABLE 1
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Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
PCBa-B004	PL-517-01292014	PCB Trench Sampling	1/29/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B005	PCBa-B005-3.0	PCB Trench Sampling	1/29/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1**	<0.05	**0.06**
PCBa-B005	PCBa-B005-5.5	PCB Trench Sampling	1/29/2014	5.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B006	PCBa-B006-2.5	PCB Trench Sampling	1/29/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.3**	**0.1**	**0.4**
PCBa-B006	PCBa-B006-5.0	PCB Trench Sampling	1/29/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B007	PCBa-B007-2.0	PCB Trench Sampling	1/29/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.2**	**0.1**	**0.205**
PCBa-B007	PCBa-B007-5.0	PCB Trench Sampling	1/29/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B008	PCBa-B008-2.0	PCB Trench Sampling	1/29/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1**	**0.1**	**0.161**
PCBa-B008	PCBa-B008-3.5	PCB Trench Sampling	1/29/2014	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B009	PCBa-B009-2.0	PCB Trench Sampling	1/29/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.5**	**0.2**	**0.7**
PCBa-B009	PCBa-B009-3.5	PCB Trench Sampling	1/29/2014	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B010	PCBa-B010-1.5	PCB Trench Sampling	1/29/2014	1.5	<0.5	<0.5	<0.5	<0.5	<0.5	**1.8**	**0.8**	**2.58**
PCBa-B010	PCBa-B010-3.0	PCB Trench Sampling	1/29/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBa-B011	PCBa-B011-1.0	PCB Trench Sampling	1/29/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.3**	**0.1**	**0.343**
PCBa-B011	PCBa-B011-2.5	PCB Trench Sampling	1/29/2014	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B001	PCBb-B001-0.5	PCB Trench Sampling	1/29/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B001	PCBb-B001-2.0	PCB Trench Sampling	1/29/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B002	PCBb-B002-2.0	PCB Trench Sampling	1/30/2014	2.0	<0.25	<0.25	<0.25	<0.25	<0.25	**1.0**	**0.5**	**1.52**
PCBb-B002	PCBb-B002-3.5	PCB Trench Sampling	1/30/2014	3.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B003	PCBb-B003-3.5	PCB Trench Sampling	1/30/2014	3.5	<0.5	<0.5	<0.5	<0.5	<0.5	**2.0**	**0.8**	**2.8**
PCBb-B003	PCBb-B003-6.5	PCB Trench Sampling	1/30/2014	6.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B004	PCBb-B004-3.0	PCB Trench Sampling	1/30/2014	3.0	<0.1	<0.1	<0.1	<0.1	<0.1	**0.6**	**0.3**	**0.87**
PCBb-B004	PCBb-B004-6.0	PCB Trench Sampling	1/30/2014	6.0	<0.25	<0.25	<0.25	<0.25	<0.25	**0.8**	**0.3**	**1.14**
PCBb-B004	PCBb-B004-8.5	PCB Trench Sampling	1/30/2014	8.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBb-B004	PL-518-01302014	PCB Trench Sampling	1/30/2014	3.0	<0.24	<0.24	<0.24	<0.24	<0.24	**1.1**	**0.5**	**1.56**
PCBb-B005	PCBb-B005-4.5	PCB Trench Sampling	1/30/2014	4.5	<0.5	<0.5	<0.5	<0.5	<0.5	**2.6**	**1.1**	**3.7**
PCBb-B005	PCBb-B005-9.5	PCB Trench Sampling	1/30/2014	9.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B006	PCBb-B006-4.5	PCB Trench Sampling	1/30/2014	4.5	<0.25	<0.25	<0.25	<0.25	<0.25	**1.2**	**0.5**	**1.72**
PCBb-B006	PCBb-B006-9.5	PCB Trench Sampling	1/30/2014	9.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B007	PCBb-B007-4.5	PCB Trench Sampling	1/30/2014	4.5	<0.099	<0.099	<0.099	<0.099	<0.099	**0.8**	**0.3**	**1.07**
PCBb-B007	PCBb-B007-9.5	PCB Trench Sampling	1/30/2014	9.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBb-B008	PCBb-B008-4.5	PCB Trench Sampling	1/30/2014	4.5	<0.25	<0.25	<0.25	<0.25	<0.25	**0.7**	**0.3**	**1.02**
PCBb-B008	PCBb-B008-8.5	PCB Trench Sampling	1/30/2014	8.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B009	PCBb-B009-3.5	PCB Trench Sampling	1/30/2014	3.5	<0.25	<0.25	<0.25	<0.25	<0.25	**1.1**	**0.4**	**1.51**
PCBb-B009	PCBb-B009-7.5	PCB Trench Sampling	1/30/2014	7.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBb-B010	PCBb-B010-3.0	PCB Trench Sampling	1/30/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.5**	**0.4**	**0.89**
PCBb-B010	PCBb-B010-5.0	PCB Trench Sampling	1/30/2014	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.6**	**0.3**	**0.91**
PCBc-B001	PCBc-B001-0.5	PCB Trench Sampling	1/31/2014	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBc-B001	PCBc-B001-1.5	PCB Trench Sampling	1/31/2014	1.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBc-B002	PCBc-B002-1.0	PCB Trench Sampling	1/31/2014	1.0	<0.25	<0.25	<0.25	<0.25	<0.25	**0.95J**	**0.4J**	**1.35**
PCBc-B002	PCBc-B002-1.5	PCB Trench Sampling	1/31/2014	1.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBc-B003	PCBc-B003-2.5	PCB Trench Sampling	1/31/2014	2.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.07**	<0.049	**0.07**

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
PCBc-B003	PCBc-B003-6.0	PCB Trench Sampling	1/31/2014	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBc-B004	PCBc-B004-4.0	PCB Trench Sampling	1/31/2014	4.0	<0.5	<0.5	<0.5	<0.5	<0.5	**3.9J**	**1.5J**	**5.4**
PCBc-B004	PCBc-B004-7.5	PCB Trench Sampling	1/31/2014	7.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBc-B004	PL-520-01312014	PCB Trench Sampling	1/31/2014	4.0	<0.099	<0.099	<0.099	<0.099	<0.099	**0.59J**	**0.25J**	**0.84**
PCBc-B005	PCBc-B005-12.5	PCB Trench Sampling	1/31/2014	12.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.3J**	**0.2J**	**0.5**
PCBc-B005	PCBc-B005-8.0	PCB Trench Sampling	1/31/2014	8.0	<0.099	<0.099	<0.099	<0.099	<0.099	**0.97J**	**0.41J**	**1.38**
PCBc-B006	PCBc-B006-12.0	PCB Trench Sampling	1/31/2014	12.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBc-B006	PCBc-B006-7.5	PCB Trench Sampling	1/31/2014	7.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.24J**	**0.12J**	**0.36**
PCBc-B007	PCBc-B007-10.0	PCB Trench Sampling	1/31/2014	10.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBc-B007	PCBc-B007-7.0	PCB Trench Sampling	1/31/2014	7.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.3**	**0.1**	**0.43**
PCBc-B008	PCBc-B008-6.0	PCB Trench Sampling	1/31/2014	6.0	<0.25	<0.25	<0.25	<0.25	<0.25	**1.3J**	**0.56J**	**1.86**
PCBc-B008	PCBc-B008-8.0	PCB Trench Sampling	1/31/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBc-B009	PCBc-B009-6.0	PCB Trench Sampling	1/31/2014	6.0	<0.5	<0.5	<0.5	<0.5	<0.5	**2J**	**0.82J**	**2.82**
PCBc-B009	PCBc-B009-8.0	PCB Trench Sampling	1/31/2014	8.0	<0.049UJ	<0.049UJ	<0.049UJ	<0.049UJ	<0.049UJ	**0.15J**	**0.064J**	**0.214**
PCBc-B010	PCBc-B010-10.5	PCB Trench Sampling	1/31/2014	10.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBc-B010	PCBc-B010-5.0	PCB Trench Sampling	1/31/2014	5.0	<1	<1	<1	<1	<1	**6.8J**	**3J**	**9.8**
PCBd-B001	PCBd-B001-0.5	PCB Trench Sampling	2/11/2014	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B002	PCBd-B002-1.5	PCB Trench Sampling	2/11/2014	1.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B002	PCBd-B002-3.0	PCB Trench Sampling	2/11/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B003	PCBd-B003-2.5	PCB Trench Sampling	2/11/2014	2.5	<0.25	<0.25	<0.25	<0.25	<0.25	**1.6J**	**0.76J**	**2.36**
PCBd-B003	PCBd-B003-5.5	PCB Trench Sampling	2/11/2014	5.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B004	PCBd-B004-4.5	PCB Trench Sampling	2/11/2014	4.5	<0.25	<0.25	<0.25	<0.25	<0.25	**1.2J**	**0.57J**	**1.77**
PCBd-B004	PCBd-B004-8.5	PCB Trench Sampling	2/11/2014	8.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B004	PL-523-02112014	PCB Trench Sampling	2/11/2014	4.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.5J**	**0.27J**	**0.77**
PCBd-B005	PCBd-B005-4.0	PCB Trench Sampling	2/11/2014	4.0	<0.1	<0.1	<0.1	<0.1	<0.1	**0.89J**	**0.45J**	**1.34**
PCBd-B005	PCBd-B005-8.0	PCB Trench Sampling	2/11/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B006	PCBd-B006-4.5	PCB Trench Sampling	2/11/2014	4.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.37J**	**0.21J**	**0.58**
PCBd-B006	PCBd-B006-9.0	PCB Trench Sampling	2/11/2014	9.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B007	PCBd-B007-5.0	PCB Trench Sampling	2/11/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B007	PCBd-B007-9.0	PCB Trench Sampling	2/11/2014	9.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B008	PCBd-B008-6.0	PCB Trench Sampling	2/11/2014	6.0	<0.099	<0.099	<0.099	<0.099	<0.099	**0.79J**	**0.39J**	**1.18**
PCBd-B008	PCBd-B008-9.0	PCB Trench Sampling	2/11/2014	9.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B009	PCBd-B009-5.0	PCB Trench Sampling	2/11/2014	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.46J**	**0.21J**	**0.67**
PCBd-B009	PCBd-B009-8.5	PCB Trench Sampling	2/11/2014	8.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBd-B010	PCBd-B010-5.0	PCB Trench Sampling	2/11/2014	5.0	<0.98	<0.98	<0.98	<0.98	<0.98	**6.9J**	**3.9J**	**10.8**
PCBd-B010	PCBd-B010-8.0	PCB Trench Sampling	2/11/2014	8.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBd-B011	PCBd-B011-5.5	PCB Trench Sampling	2/11/2014	5.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBd-B011	PCBd-B011-8.0	PCB Trench Sampling	2/11/2014	8.0	<0.24	<0.24	<0.24	<0.24	<0.24	**1.1J**	**0.51J**	**1.61**
PCBe-B001	PCBe-B001-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B002	PCBe-B002-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.12**	**0.087**	**0.207**
PCBe-B002	PCBe-B002-2.0	PCB Trench Sampling	3/5/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B003	PCBe-B003-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	**0.13**	**0.075**	**0.205**

HARGIS + ASSOCIATES, INC.

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
PCBe-B003	PCBe-B003-3.0	PCB Trench Sampling	3/5/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B004	PCBe-B004-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBe-B004	PCBe-B004-2.0	PCB Trench Sampling	3/5/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B004	PL-525-03052014	PCB Trench Sampling	3/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B005	PCBe-B005-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B005	PCBe-B005-2.0	PCB Trench Sampling	3/5/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBe-B006	PCBe-B006-1.0	PCB Trench Sampling	3/5/2014	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBe-B006	PCBe-B006-2.0	PCB Trench Sampling	3/5/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBe-B007	PCBe-B007-2.0	PCB Trench Sampling	3/5/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBf-B001	PCBf-B001-1.0	PCB Trench Sampling	3/7/2014	1.0	<0.098	<0.098	<0.098	<0.098	<0.098	**0.14**	**0.1**	**0.24**
PCBf-B001	PCBf-B001-2.0	PCB Trench Sampling	3/7/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBf-B002	PCBf-B002-1.0	PCB Trench Sampling	3/7/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBf-B002	PCBf-B002-2.0	PCB Trench Sampling	3/7/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PCBf-B003	PCBf-B003-1.0	PCB Trench Sampling	3/7/2014	1.0	<0.49	<0.49	<0.49	<0.49	<0.49	**0.94**	<0.49	**0.94**
PCBf-B003	PCBf-B003-2.0	PCB Trench Sampling	3/7/2014	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.054**	<0.049	**0.054**
PCBg-B001	PCBg-B001-1.0	PCB Trench Sampling	3/10/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B001	PCBg-B001-2.0	PCB Trench Sampling	3/10/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B002	PCBg-B002-1.0	PCB Trench Sampling	3/10/2014	1.0	<2	<2	<2	<2	<2	**2.4**	<2	**2.4**
PCBg-B002	PCBg-B002-2.0	PCB Trench Sampling	3/10/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B003	PCBg-B003-14.0	PCB Trench Sampling	3/10/2014	14.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B003	PCBg-B003-4.0	PCB Trench Sampling	3/10/2014	4.0	<5	<5	<5	<5	<5	**6.3**	<5	**6.3**
PCBg-B003	PCBg-B003-8.0	PCB Trench Sampling	3/10/2014	8.0	<1	<1	<1	<1	<1	**1.9**	<1	**1.9**
PCBg-B004	PCBg-B004-1.0	PCB Trench Sampling	3/10/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B004	PCBg-B004-2.0	PCB Trench Sampling	3/10/2014	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B004	PL-526-03102014	PCB Trench Sampling	3/10/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B005	PCBg-B005-1.0	PCB Trench Sampling	3/10/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B005	PCBg-B005-3.0	PCB Trench Sampling	3/10/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B005	PCBg-B005-4.0	PCB Trench Sampling	3/10/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B006	PCBg-B006-1.0	PCB Trench Sampling	3/10/2014	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B006	PCBg-B006-3.0	PCB Trench Sampling	3/10/2014	3.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PCBg-B006	PCBg-B006-4.0	PCB Trench Sampling	3/10/2014	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PNO-B001	PNO-B001-0.5	Ph 1 CAA HHRA	8/19/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PNO-B002	PNO-B002-0.5	Ph 1 CAA HHRA	8/19/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSO-B001	PSO-B001-0.5	Ph 1 CAA HHRA	8/19/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSO-B002	PSO-B002-0.5	Ph 1 CAA HHRA	8/19/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PWE-B004	PWE-B004-0.5	Ph 1 CAA HHRA	8/19/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
10-B002	10-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
15-B002	15-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
P02-B002	P02-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
P04-B003	P04-B003-0.5	Ph 2 and 3 CAA HHRA	11/14/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
P04-B004	P04-B004-0.5	Ph 2 and 3 CAA HHRA	11/14/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
P06-B001	P06-B001-0.5	Ph 2 and 3 CAA HHRA	11/14/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND

HARGIS + ASSOCIATES, INC.

TABLE 1
PCB CONCENTRATIONS IN SOIL

Location ID	Field Sample ID	Sampling Program	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
P06-B002	P06-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	**0.063**	**0.29**	**0.18**	**0.533**
P09-B001	P09-B001-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
P09-B002	P09-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PNE-B001	PNE-B001-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PNE-B002	PNE-B002-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PNO-B003	PNO-B003-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PNO-B004	PNO-B004-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSE-B001	PSE-B001-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSO-B003	PSO-B003-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
PSO-B004	PSO-B004-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PSO-B005	PSO-B005-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
PWE-B005	PWE-B005-0.5	Ph 2 and 3 CAA HHRA	11/12/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B007	29-B007-0.5	Supplemental Soil 2013	2/18/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.068**	**0.065**	**0.133**
29-B007	29-B007-10.0	Supplemental Soil 2013	2/18/2013	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B007	29-B007-5.0	Supplemental Soil 2013	2/18/2013	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B007	PL-510-021813	Supplemental Soil 2013	2/18/2013	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B008	29-B008-0.5	Supplemental Soil 2013	2/18/2013	0.5	<0.05	<0.05	<0.05	<0.05	**0.1**	**0.076**	<0.05	**0.176**
29-B008	29-B008-10.0	Supplemental Soil 2013	2/18/2013	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
29-B008	29-B008-5.0	Supplemental Soil 2013	2/18/2013	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B017	31-B017-0.5	Supplemental Soil 2013	2/18/2013	0.5	<0.05	<0.05	<0.05	<0.05	**0.27**	**0.46**	<0.05	**0.73**
31-B017	31-B017-10.0	Supplemental Soil 2013	2/18/2013	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B017	31-B017-5.0	Supplemental Soil 2013	2/18/2013	5.0	<0.05	<0.05	<0.05	<0.05	**0.17**	**0.2**	<0.05	**0.37**
31-B018	31-B018-0.5	Supplemental Soil 2013	2/18/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B018	31-B018-10.0	Supplemental Soil 2013	2/18/2013	10.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B018	31-B018-5.0	Supplemental Soil 2013	2/18/2013	5.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND

Notes:

< = Less than. Concentration was not detected greater than the detection limit

J = Estiamted Value

Cocentration of individual aroclor is greater than the cleanup level of 0.22 mg/kg

Total PCB concentration (sum of all detected aroclors for a given sample) is greater than the US EPA TSCA level of 50 mg/kg

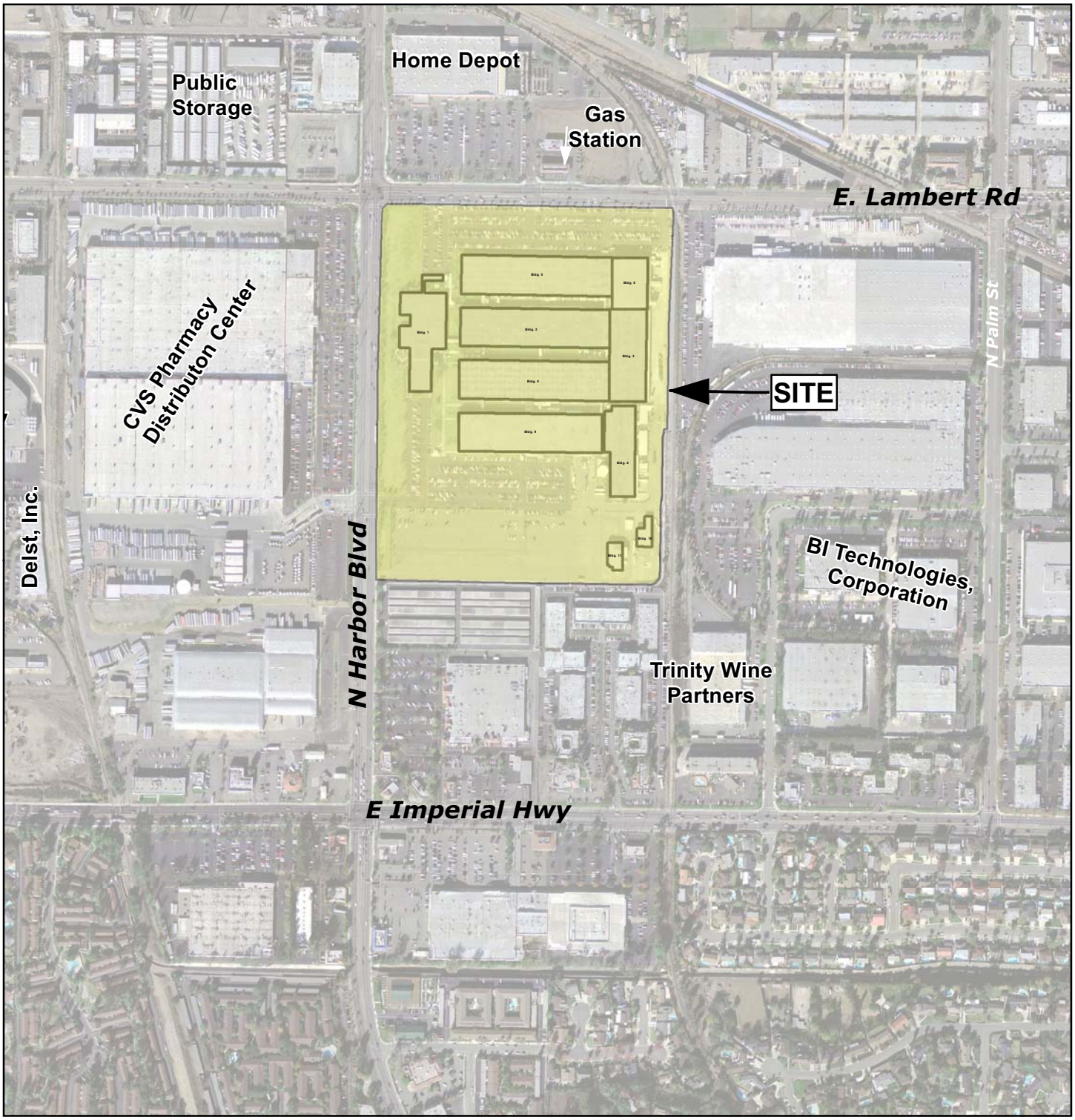
mg/kg = milligram per kilogram

US EPA TSCA = US Environmental Protection Agency - Toxic Substance Control Act

All results are in mg/kg

All detections are **bold**

FIGURES



N

Feet

0 600

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

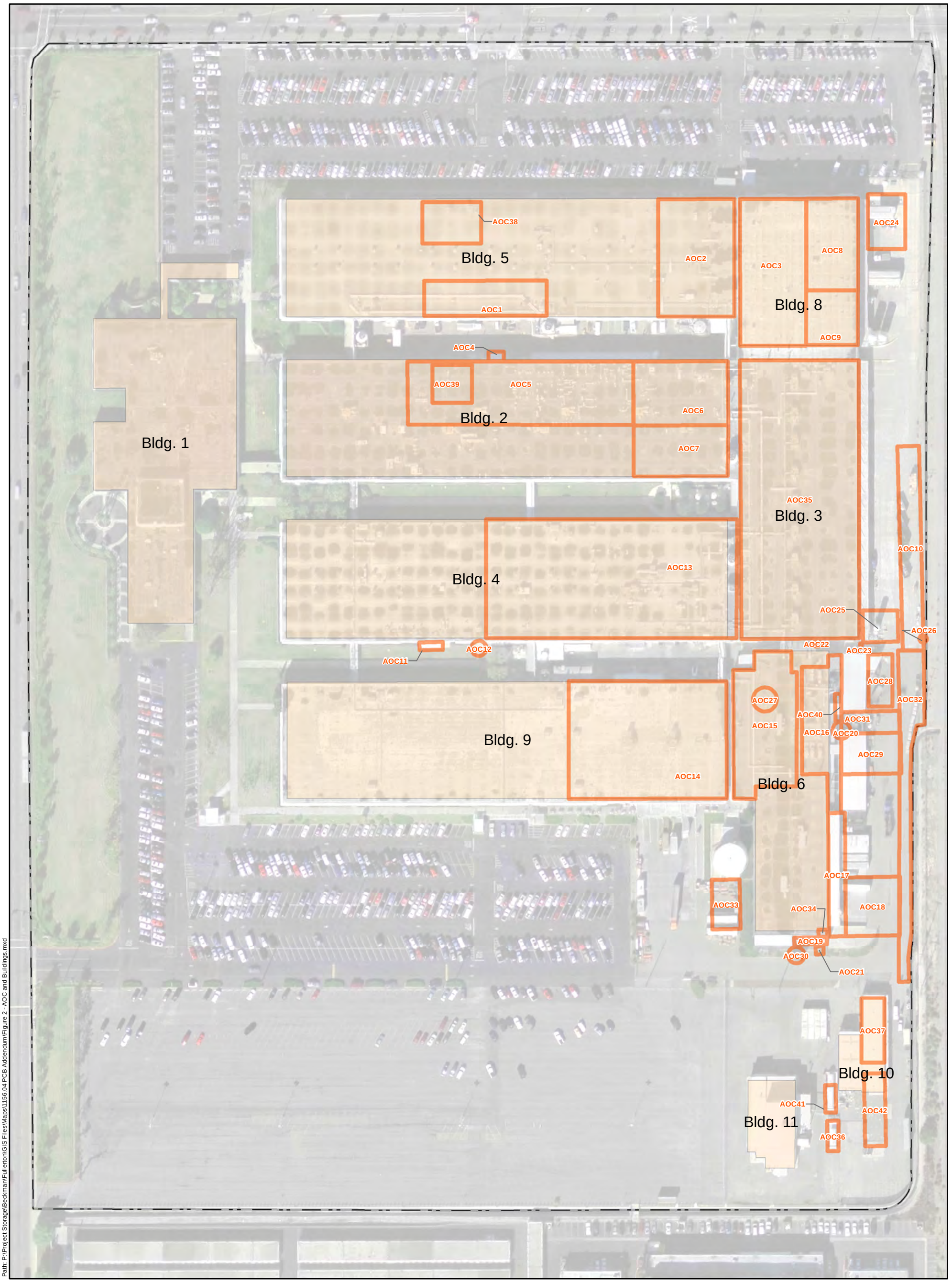
SITE LOCATION

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY · ENGINEERING

5/4/2012

FIGURE 1

PREP BY _DAT_ REV BY _BAM_ RPT NO 1029.22



Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Figure 2 - AOC and Buildings.mxd

EXPLANATION

- Property Boundary
- Areas of Concern
- Buildings

0 62.5 125 250 Feet

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

BUILDING AND AOC LOCATIONS

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

3/26/2014

FIGURE 2

PREP BY: DAT
REV BY: MRL

PROJECT: 1156.04

Bldg. 5
Bldg. 8
Bldg. 1
Bldg. 2
Bldg. 3
Bldg. 4
Bldg. 9
Bldg. 6
Bldg. 10
Bldg. 11
#1
#2
#3
#4
#5
#6
#7
#8
#10
#11
#12
#13
#14

Document Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Figure 3_PCB areas and samples all.mxd

EXPLANATION

- PCB locations > SL
- PCB locations < SL
- #6 Approximate PCB Transformer Location
- Storm Water Drainage Trench

NOTES:
The established cleanup level for PCBs is 0.22 mg/kg
mg/kg = milligrams per kilogram

0 125 250 Feet

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

POLYCHLORINATED BIPHENYLS SOIL SAMPLING LOCATIONS

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

3/26/2014

FIGURE 3

PREP BY: DAT REV BY: DM RPT NO: 1156.04

Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Figure 4_PCB removal areas_IRM.mxd

EXPLANATION

- Exceeds Residential RSL
- Exceeds Industrial RSL
- PCB Sample Location
- PCB Removal Area

N

0 75 Feet

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

PCB EXCEEDANCE POINTS
AND PCB REMOVAL AREAS

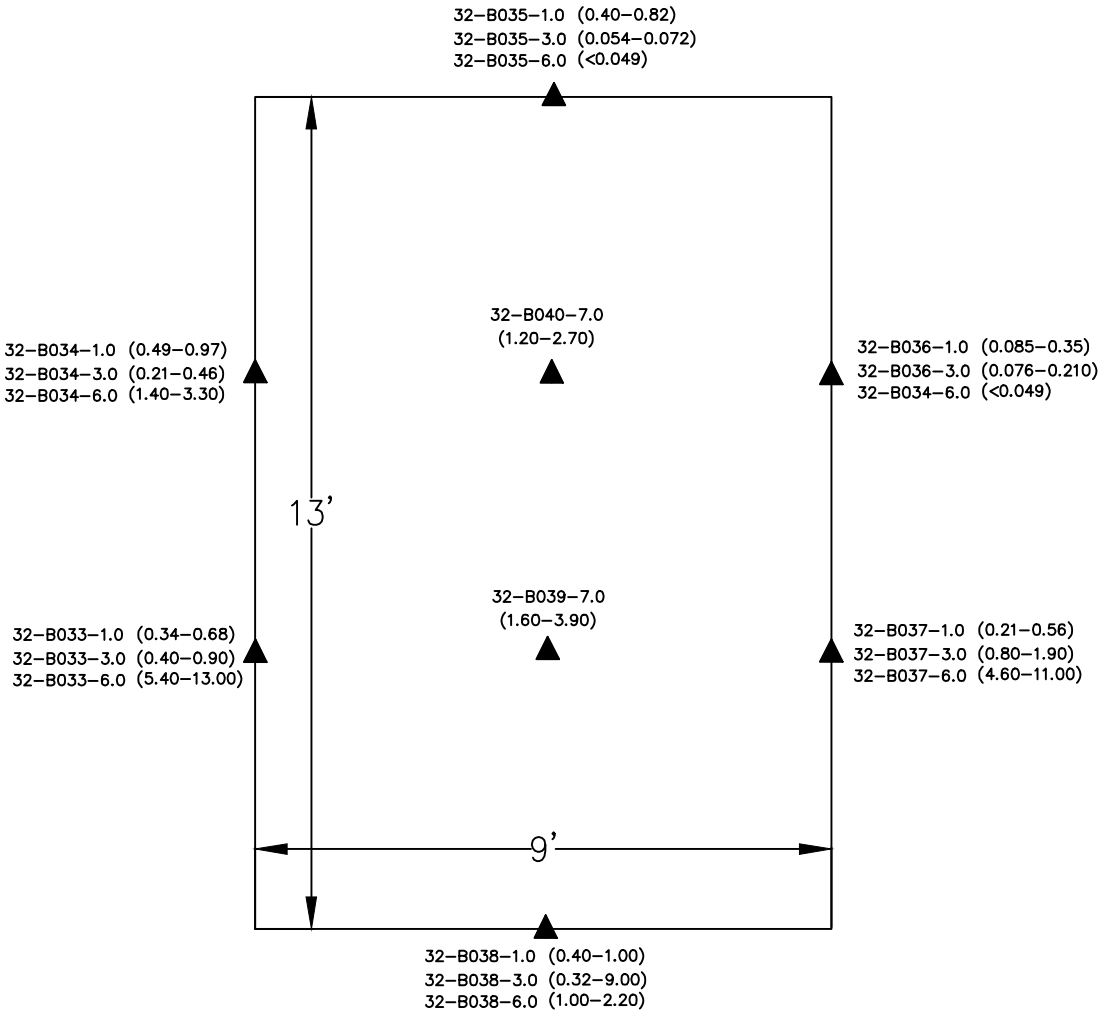
HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

3/26/2014

FIGURE 4

PREP BY DAT REV BY MRL RPT NO 1156.04

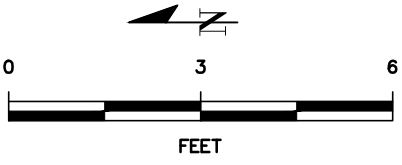
32-B012 EXCAVATION



29-B014-2.0 —— SAMPLE ID
(1.40-2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

NOTES:

1. SIDEWALL SAMPLES COLLECTED AT THREE DEPTHS: 1, 3, AND 6 FT.
2. TWO SAMPLES COLLECTED ON THE FLOOR AT 7 FT. DEPTH

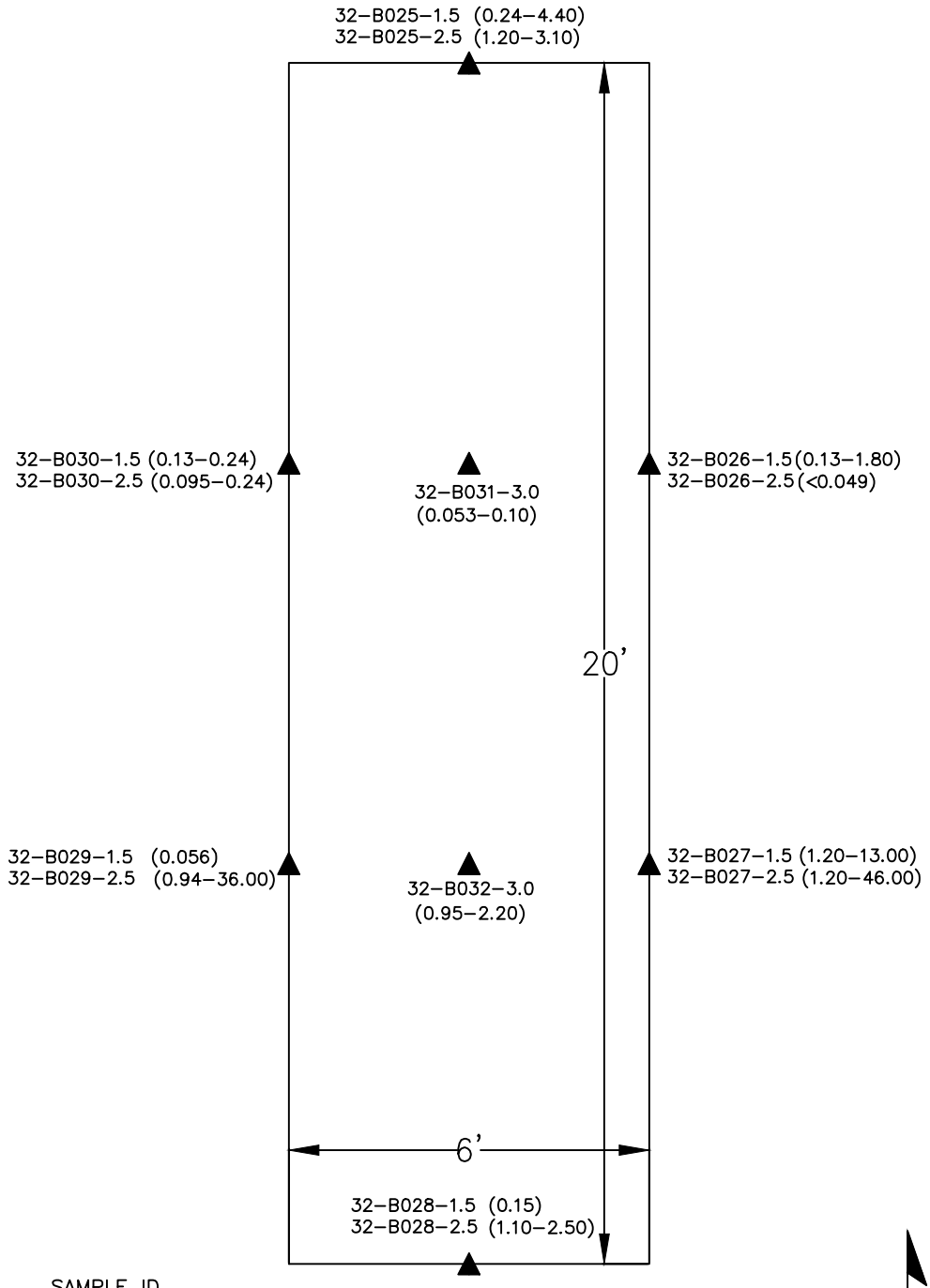


4/14	RPT NO.1156.04	FIGURE 5

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

PCB Sampling Locations
Sample Date 12/2/2013

32–B001 EXCAVATION



29–B014–2.0 —— SAMPLE ID
(1.40–2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

N

0 3 6
FEET

NOTES:

1. SIDEWALL SAMPLES COLLECTED AT TWO DEPTHS: 1.5 AND 2.5 FT.
2. TOTAL DEPTH IS 3 FT.

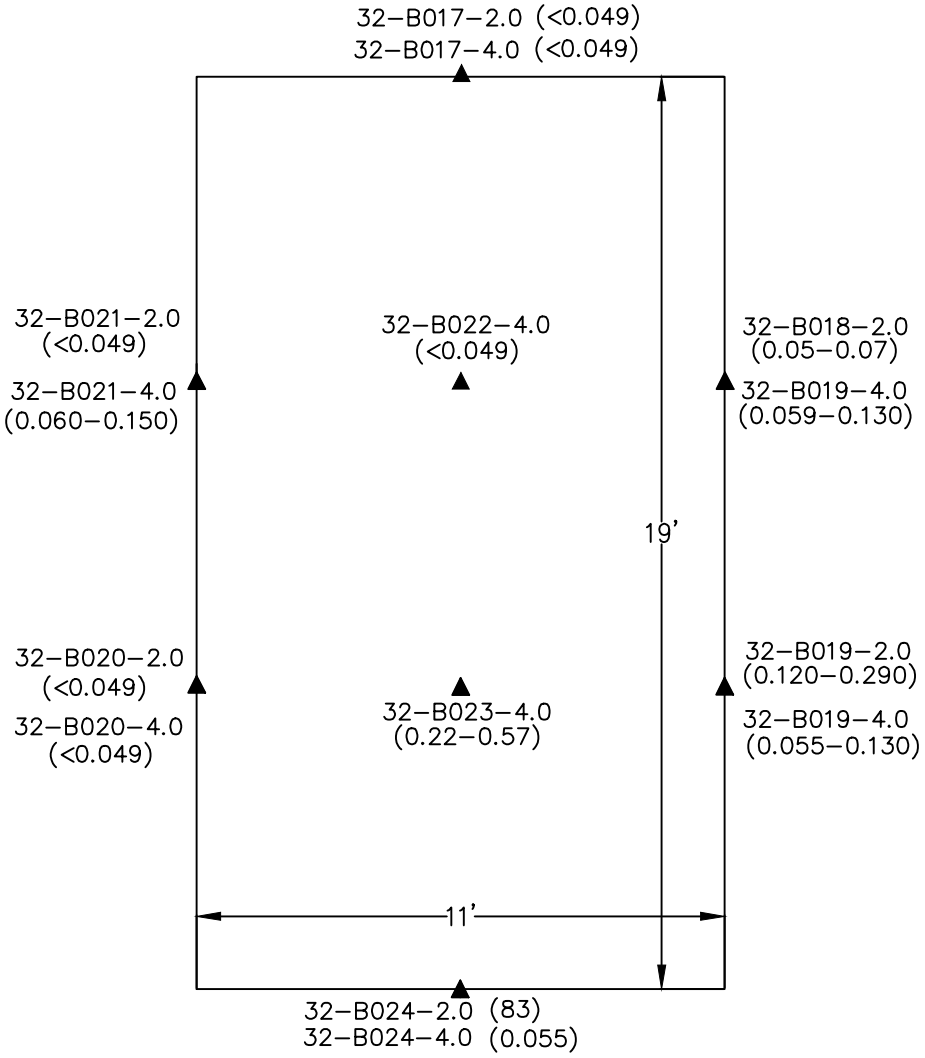
4/14	RPT NO.1156.04	FIGURE 6

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

PCB Sampling Locations
Sample Date 11/26/2013

Apr 07, 2014 – 12:10pm ALE – K:\ALE\BCI Fullerton\Drawings & Figures\dwg\BCI Fullerton PCB Sampling Locations.dwg

32B006/32-B008 EXCAVATION



29-B014-2.0 —— SAMPLE ID
(1.40-2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

NOTES:

1. SIDEWALL SAMPLES COLLECTED AT TWO DEPTHS: 2 FT AND 4 FT
2. TOTAL DEPTH OF EXCAVATION IS 4 FT

N

0 4 8

FEET

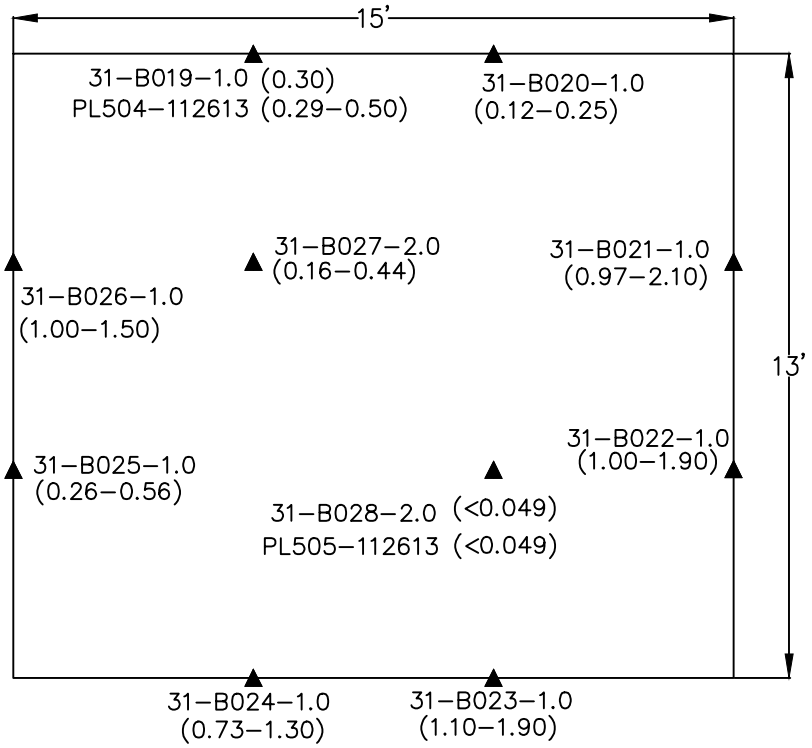
4/14	RPT NO.1156.04	FIGURE 7

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

PCB Sampling Locations
Sample Date 11/25/2013

Apr 07, 2014 - 12:09pm ALE - K:\ALE\BCI Fullerton\Drawings & Figures\dwg\BCI Fullerton PCB Sampling Locations.dwg

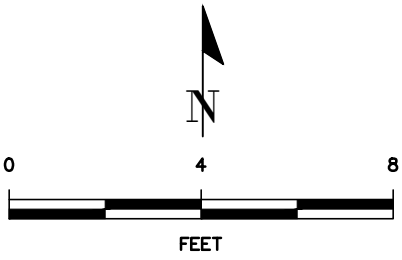
SC–03/31–B017 EXCAVATION



29–B014–2.0 —— SAMPLE ID
(1.40–2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

NOTES:

1. SIDEWALL SAMPLES COLLECTED AT ONE DEPTH: 1 FT
2. TOTAL DEPTH OF EXCAVATION IS 2 FT



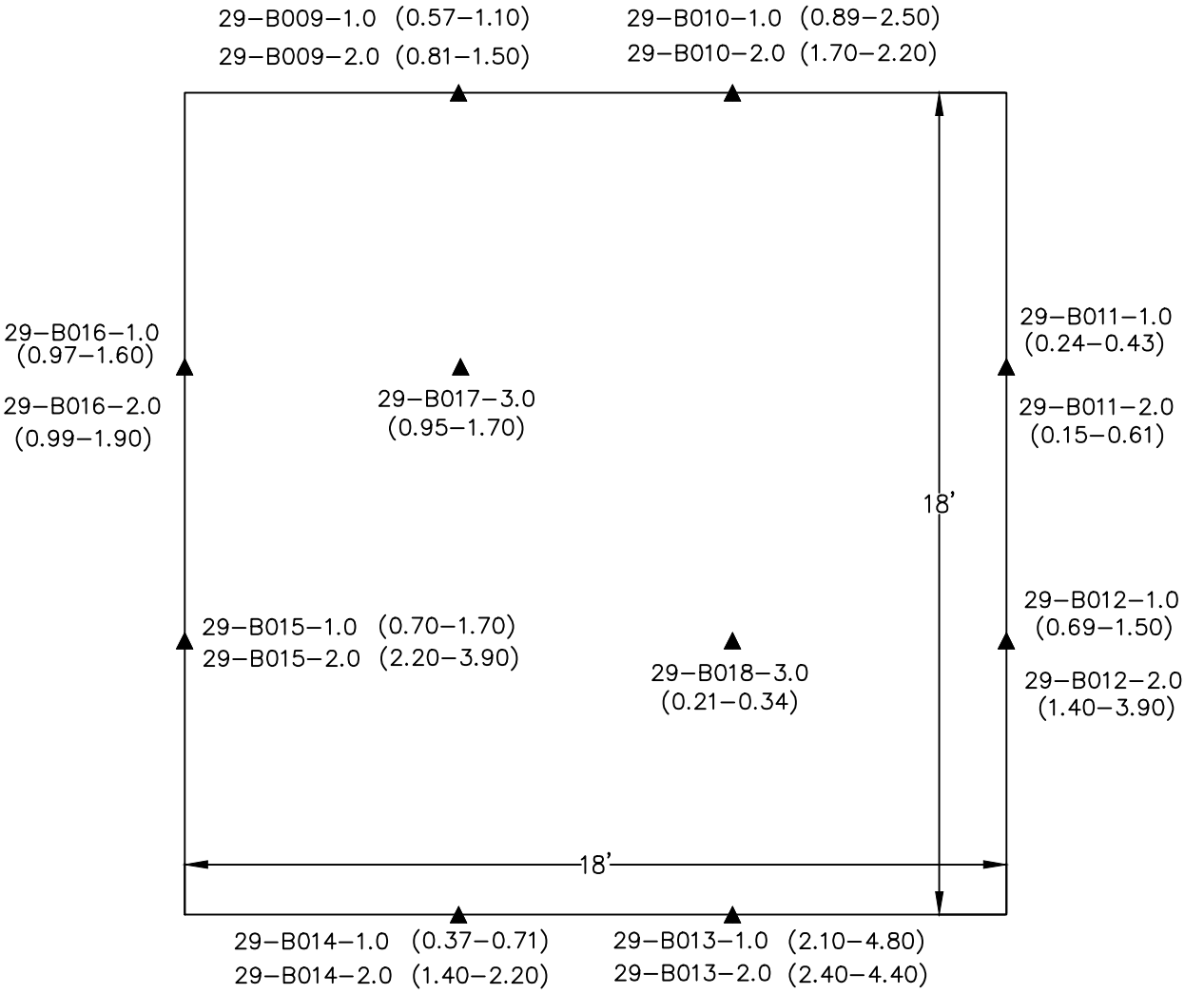
Apr 07, 2014 – 12:09pm ALE – K:\ALE\BCI Fullerton\Drawings & Figures\dwg\BCI Fullerton PCB Sampling Locations.dwg

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

4/14	RPT NO.1156.04	FIGURE 8

PCB Sampling Locations
Sample Date 11/26/2013

SC–02 EXCAVATION



29–B014–2.0 —— SAMPLE ID
(1.40–2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

NOTES:

1. SIDEWALL SAMPLES COLLECTED AT TWO DEPTHS: 1 FT AND 2 FT
2. TOTAL DEPTH OF EXCAVATION IS 3 FT

N

0 4 8

FEET

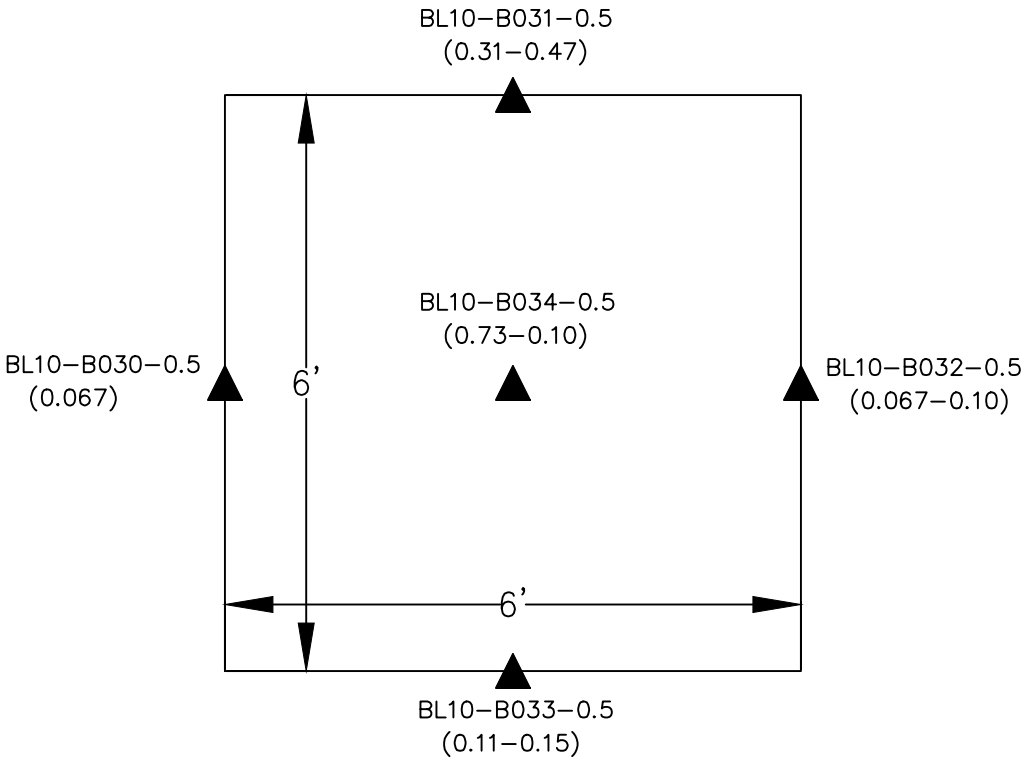
Apr 07, 2014 – 12:09pm ALE – K:\ALE\BCI Fullerton\Drawings & Figures\dwg\BCI Fullerton PCB Sampling Locations.dwg

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

4/14	RPT NO. 1156.04	FIGURE 9

PCB Sampling Locations
Sample Date 11/27/2013

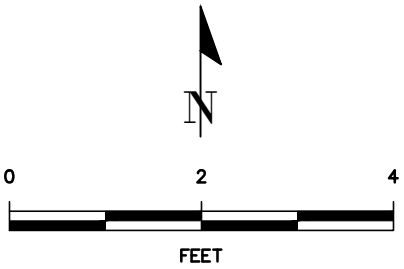
BL10–B024 EXCAVATION



29–B014–2.0 —— SAMPLE ID
(1.40–2.20) —— PCB SAMPLE RESULT (mg/kg)
▲ —— SAMPLE LOCATION

NOTES:

1. ONE SAMPLE COLLECTED AT EACH SIDEWALL AT DEPTH OF 0.5 FT
2. ONE SAMPLE COLLECTED IN MIDDLE OF FLOOR AT DEPTH OF 1 FT

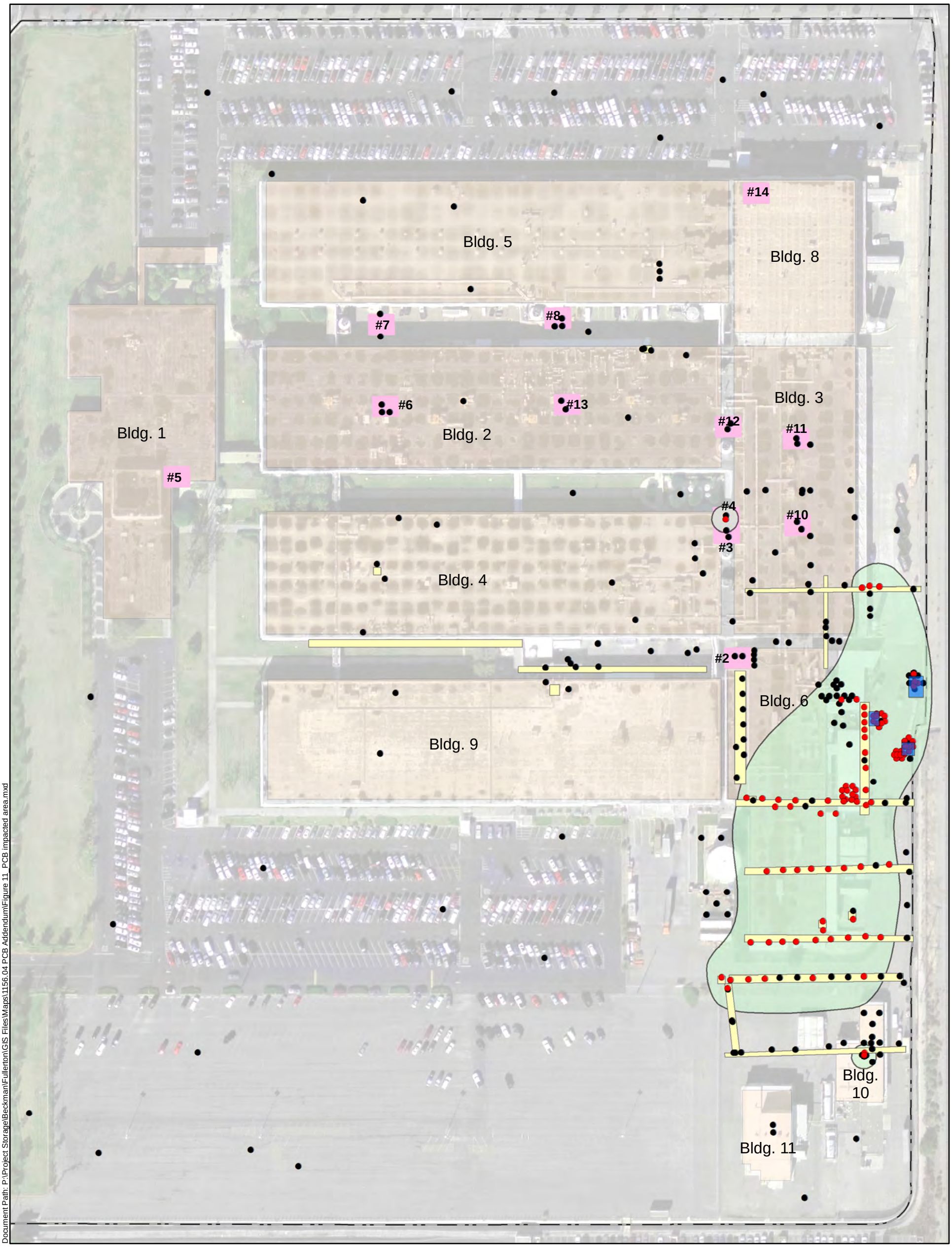


4/14	RPT NO. 1156.04	FIGURE 10

HARGIS + ASSOCIATES, INC.
Hydrogeology/Engineering

PCB Sampling Locations
Sample Date 12/5/2013

Apr 07, 2014 – 12:10pm ALE – K:\ALE\BCI Fullerton\Drawings & Figures\dwg\BCI Fullerton PCB Sampling Locations.dwg



Document Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Figure 11_PCB impacted area.mxd

EXPLANATION

- PCB sample location where concentration is greater than the cleanup level
- PCB sample location where concentration is less than the cleanup level
- Approximate demolition or PCB trench location
- Approximate aerial extent of PCB-impcated soil
- TSCA PCB-Impacted Area
- #6 Approximate PCB Transformer Location

NOTES:
The established cleanup level for PCBs is 0.22 mg/kg
mg/kg = milligrams per kilogram

0 125 250 Feet

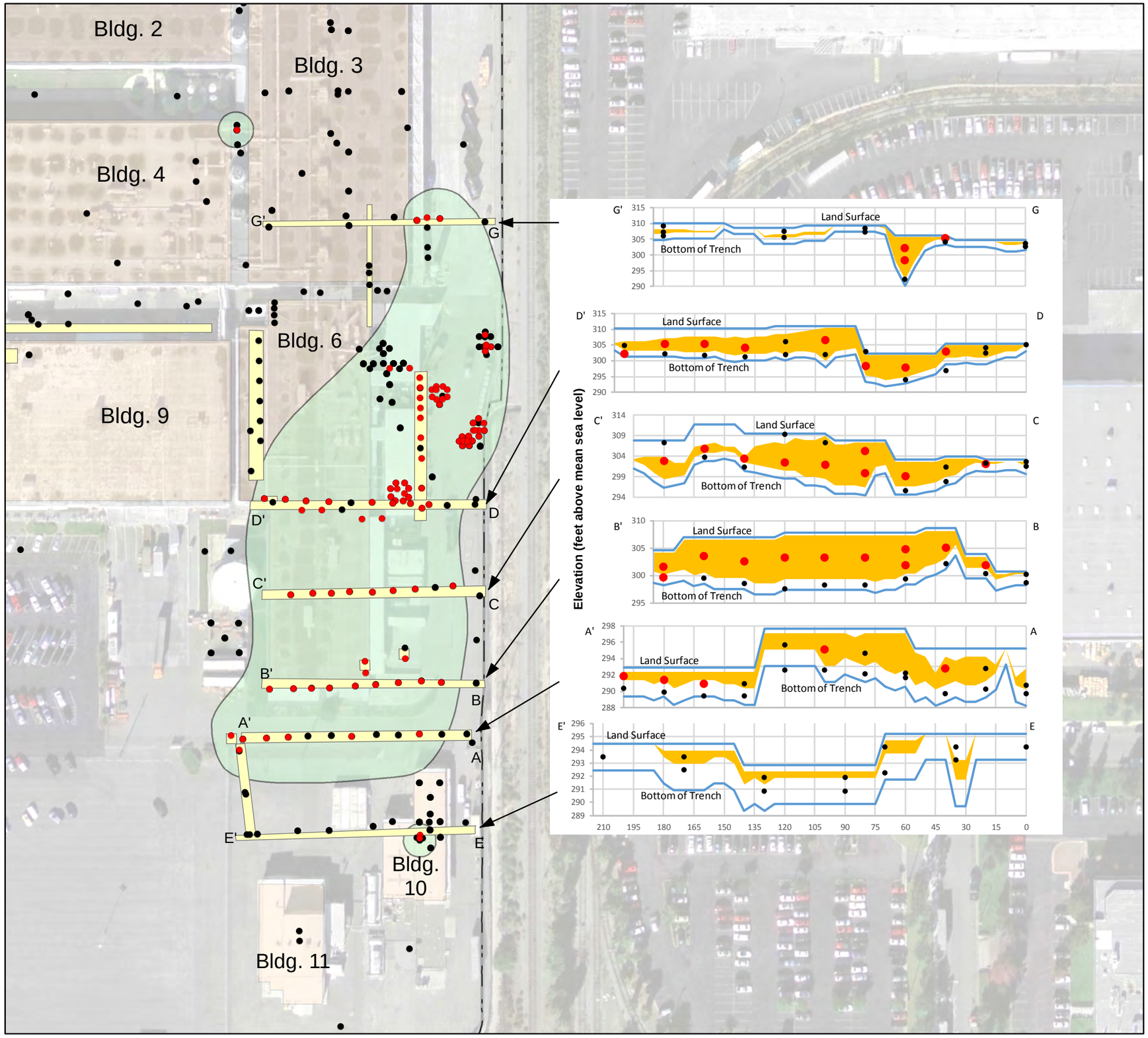
BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

AERIAL EXTENT OF PCB-IMPACTED SOIL

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

FIGURE 11

PREP BY: DAT REV BY: MRL RPT NO: 1156.04 6/18/2014



EXPLANATION

- PCB sample location where concentration is greater than the cleanup level
- PCB sample location where concentration is less than the cleanup level
- Approximate demolition or PCB trench location
- Approximate areal extent of PCB-impcated soil
- Approximate thickness of soil indicative of PCB impacts along a trench

NOTES:
The established cleanup level for PCBs is 0.22 mg/kg
mg/kg = milligrams per kilogram

N

0 50 100 200 Feet

BECKMAN COULTER, INC.

FULLERTON, CALIFORNIA

THICKNESS OF SOIL INDICATIVE OF PCB-IMPACTED SOIL

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

FIGURE 12

PREP BY: DAT REV BY: MRL RPT NO: 1156.04 3/31/2014

Document Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Figure 13_PCB impacted area_map.mxd

APPENDIX A

HISTORICAL PCB RELATED DOCUMENTS

2500 Harbor Boulevard, Box 3100, Fullerton, CA 92634-3100 • (714) 871-4848

BECKMAN

July 6, 1989

Section Chief, Toxic Section, T-5-2
Toxics and Waste Managements Division
U. S. Environmental Protection Agency, Region IX
215 Fremont Street
San Francisco, CA 94105

Ref. Docket # TSCA-0988-0023

Gentlemen:

Re: Revised PCB Annual Document for Calendar Year 1987

While in the course of preparing our facility's PCB annual document for the calendar year 1988, an error was discovered in the 1987 report. More specifically, the weight of PCBs in transformers remaining in service at the end of the calendar year 1987 is in error due to a miscalculation.

Therefore, we are submitting a corrected copy of the 1987 report.

If you have any questions concerning this revised report, please call me at 714/773-7929.

Sincerely,

Lessly McCarley

Lessly McCarley
Environmental Health & Safety Specialist

LM/cbc

Enclosure

LESSLY20

bcc: B. Sike
J. Sorokin

BECKMAN INSTRUMENTS INC.
2500 HARBOR BLVD.
FULLERTON, CA 92634

PCB ANNUAL DOCUMENT FOR CALENDER YEAR 1987
ITEMS REMOVED FROM SERVICE

Items Removed	Dates Items Removed from Service	Dates Items Placed into Storage for Disposal	Dates Items Placed on to Transport Disposal	Weights in Kilograms of PCBs and PCB Items in containers	Number of PCB Transformers Weight of PCBs	Number of PCB High and Low Volt Capacito
9410-62	7/18/87	7/18/87	7/18/87	0	1 @ 2494.8	0
B975272	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
B975271	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
			TOTALS	0	3 @ 5488.6 kg	

FACILITIES INFORMATION

Location of Initial Storage or Disposal Facility and the name of the owner or operator of the facility:
See attached manifest

ITEMS IN SERVICE AT END OF YEAR

Items	Wt. in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers and Weight of PCBs	Number of PCB High and Low Volt Capacitors
7372815	0	1 @ 2630.4	0
9473-62	0	1 @ 2494.3	0
35427	0	1 @ 1424.0	0
TOTALS	0	3 @ 6548.7	0

State of California — Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-88)
Please print or type. (Form designed for use on elite (12-pitch typewriter).

Department of Health Service
Toxic Substances Control Divisic
Sacramento, Californ

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. C A D 0 0 8 2 5 4 7 0 8 — Manifest Document No. 0 0 0 0 1

2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Beckman Instruments
2500 N. Harbor Blvd., Fullerton, CA. 92633
4. Generator's Phone (714 990-4100

A. State Manifest Document Number 87325005

B. State Generator's ID C A D 0 0 8 2 5 4 7 0 8

5. Transporter 1 Company Name: American Environmental Mgmt. Co.
6. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

C. State Transporter's ID 80240

D. Transporter's Phone 714 826-6320

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
American Environmental Mgmt. Co.
11855 White Rock Road
Rancho COrdova, CA. 95670
10. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

G. State Facility's ID CAD980894183

H. Facility's Phone 916 985-6666

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. "RQ" Waste Hazardous Substance, N.O.S., ORM-E NA 9188 (Containing Polychlorinated Biphenyls	003	CM	29150	P	State 261 / EPA/Other RCRA Exempt
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Item A: Transformer carcusses containing unknown concentrations of PCB oil
Out of Service Date 7/8/87

K. Handling Codes for Wastes Listed Above
a. 14 b. c. d.

15. Special Handling Instructions and Additional Information
PVC Boots and Gloves, White Tyvek, 1/2 Face Resp. and Saranex Suit on stand by
Job #5981 AEMC Approval #0231

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: LELOND A. PARDE — Signature — Month Day Year: 07 16 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: FRANC ESCALERA — Signature — Month Day Year: 07 16 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Kevin Tenio — Signature — Month Day Year: 07 29 87

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A (1/87)
EPA 8700—22
(Rev. 9-86) Previous editions are obsolete.

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

INSTRUCTIONS ON THE BACK

BECKMAN INSTRUMENTS, INC.
2500 Harbor Blvd.
Fullerton, CA 92634

PCB Annual Document for Calendar Year 1988
Items Removed from Service

Items Removed	Dates Items Removed from Service	Dates Items Placed into Storage for Disposal	Dates Items Placed into Transport for Disposal	Weights in Kilograms of PCBs and PCB Items in Containers	Weights in Kilograms of Number of PCB Transformers Weight of PCBs	Weights in Kilograms of Number of PCB High and Low Volt Capacitors
PCB Light Ballasts	5/9/88	5/9/88	5/9/88	1814.4*	0	0

*This weight in kilograms is the total weight of six drums containing light ballast and packing material. Our facility does not have information on the weight of PCBs in the light ballasts alone.

FACILITIES INFORMATION

Location of initial storage or disposal facility and the name of the owner or operator of the facility: see attached manifest

ITEMS IN SERVICE AT END OF YEAR

Item	Wt in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers and Weight of PCBs	Number of PCB High or Low Volt Capacitors
7372815	0	1 @ 2630.4 **	0
9473-62	0	1 @ 2494.3 **	0
35427	0	1 @ 1424.0 **	0
Total	0	3 @ 6548.7 kg	0

**These weights differ from the 1987 report due to an error in converting from pounds to kilograms.

BECKMAN INSTRUMENTS, INC.
2500 Harbor Blvd.
Fullerton, CA 92634

PCB Annual Document for Calendar Year ~~1994~~ 1989
Items Removed from Service

Items Removed	Removed from Service	Placed into storage for disposal	Placed into transport for disposal	PCBs and PCB items in containers	Number of PCB transformers and weight of PCBs	Number of PCB high and low Volt capacitors
PCB Transformers:						
#737815	7/01/89	7/01/89	7/01/89	0	1 @ 2630.4	**0**
#9473-62	7/01/89	7/01/89	7/01/89	0	1 @ 2494.3	**0**
#35427	7/01/89	7/01/89	7/01/89	0	1 @ 1424.0	**0**
PCB Light Ballasts	4/10/89	4/10/89	4/10/89	2217	0	**0**

*This weight in kilograms is the total weight of four drums containing light ballast and packing material. Our facility does not have information on the weight of PCBs in the light ballasts alone.

FACILITIES INFORMATION

Location of initial storage or disposal facility and the name of the owner or operator of the facility:
See attached manifest

ITEMS IN SERVICE AT END OF YEAR

Item	Wt in Kilograms of PCB's and PCB Items in Containers	Number of PCB Transformers and weight of PCB's	Number of PCB High or Low Volt Capacitors
0	0	0	0
0	0	0	0
0	0	0	0
0	0	0	0

State of California—Health and Welfare Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-91)
Please print or type. (Form designed for use on elite (12-pitch typewriter).

590-11/C0611

Department of Health Se
Toxic Substances Control Divi
Sacramento, Californ

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD008251708 — Manifest Document No. 88118258

2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
BECKMAN INSTRUMENTS
2500 NO. HARBOR BLVD., FULLERTON, CA. 92635

4. Generator's Phone (714) 773-7821

A. State Manifest Document Number 88118258

B. State Generator's ID 075080354218

5. Transporter 1 Company Name — 6. US EPA ID Number
HIGH VOLTAGE TRANSFORMER SVCS.CO. CAD076545835

C. State Transporter's ID 1308/SC0183

D. Transporter's Phone 213-804-3377

7. Transporter 2 Company Name — 8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address — 10. US EPA ID Number
U.S. ECOLOGY, INC.
HIGHWAY 95, 10 MILES SO.
BEATTY, NV. 89003 NVT330010000

G. State Facility's ID NVDPC8001

H. Facility's Phone (712)553-2203

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. HAZARDOUS SUBSTANCE, SOLID, N.O.S., ORM-E NA9188 (PCB) RQ	1	DM	1400	P	State 201PCB EPA/Other
b.					State EPA/Other
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
a. BALLASTS

K. Handling Codes for Wastes Listed Above
a. b. c. d.

NVTPCB 034

15. Special Handling Instructions and Additional Information
SPECIAL PROTECTIVE SUITING, RESPIRATOR, FOOTWEAR, GLOVES AND FACE SHIELDS ARE NEEDED. AVOID SKIN CONTACT. ALTERNATE TSDF: RETURN TO GENERATOR.
W.S.#: 07-003-4808

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

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Printed/Typed Name: LELAND A PAIGE — Signature — Month 04 Day 16 Year 87

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: JACK WEEMS — Signature — Month 04 Day 19 Year 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: Michael E. Stoka — Signature — Month 04 Day 11 Year 87

Do Not Write Below This Line

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30

GENERATOR

TRANSPORTER

FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

88118258

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. (Form designed for use on elite (12-pitch) typewriter).

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD058154778
Manifest Document No.
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
A. State Manifest Document Number 88464515
4. Generator's Phone
B. State Generator's ID
5. Transporter 1 Company Name AMERICAN ENVIRONMENTA
6. US EPA ID Number CAD980884183
C. State Transporter's ID
D. Transporter's Phone 714 8266320
7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone
9. Designated Facility Name and Site Address
AMERICAN ENVIRONMENTAL
11855 White Rock
Rancho CORDOVA, CA 95670
10. US EPA ID Number CAD980884183
G. State Facility's ID CAD980884183
H. Facility's Phone 714 8266320

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. [illegible]	01	[illegible]	[illegible]	P	State 261 EPA/Other N/A
b. [illegible]	01	[illegible]	[illegible]	P	State 261 EPA/Other N/A
c.					State EPA/Other
d.					State EPA/Other

J. Additional Descriptions for Materials Listed Above
[illegible]

K. Handling Codes for Wastes Listed Above
a. 14
b. 14
c.
d.

15. Special Handling Instructions and Additional Information
[illegible]

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name [illegible] Signature [illegible] Month Day Year [illegible]

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name ANDREW DINO PASSARELLI / Rodney Clem Signature [signature] Month Day Year 07 01 89

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name Signature Month Day Year

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name Steven Hager Signature Steven Hager Month Day Year 07 05 89

GENERATOR / TRANSPORTER / FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

88464515

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

Rec'd 2/10/89

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
215 Fremont Street
San Francisco, Ca. 94105

February 6, 1989

CERTIFIED MAIL NO. P 735 586 636
Return Receipt Requested

In Reply: T-5-2
Refer to: TSCA-09-88-0023

Arnold O. Beckman
CHB
Beckman Instruments, Inc.
2500 Harbor Blvd.
Fullerton, CA 92634

Dear Mr. Beckman:

Enclosed is your copy of the fully executed Consent Agreement and Final Order which contains the terms of the settlement reached with Robert Bergstrom of the Office of Regional Counsel.

Your completion of all remedial actions enumerated in the Consent Agreement and Final Order will close this case. If you have any questions regarding the rules, regulations and statutes governing your operations which are implemented by the Agency or which govern the proceedings terminated by the enclosed document, please contact Robin Kreger at 415-974-7294.

Sincerely,

Jeff Zelikson
Director
Toxics and Waste Management Division

Enclosure

CERTIFICATE OF SERVICE

I hereby certify that the original of the foregoing Consent Agreement and Final Order Docket No. TSCA-09-88-0023 was filed with the Regional Hearing Clerk, Environmental Protection Agency, Region 9, and that copies, addressed as follows, were served by mailing Certified Mail, Return Receipt Requested, postage prepaid, in a United States Mail Box, at the City and County of San Francisco, California, on the 6th day of February, 19~~89~~:

Arnold O. Beckman, CHB
Beckman Instruments, Inc.
2500 Harbor Blvd.
Fullerton, CA 92634

Certified Mail #

P 735 586 636

Jack E. Sorokin
Associate Counsel
Office of General Counsel
Beckman Instruments, Inc.
2500 Harbor Blvd.
Fullerton, CA 92634

Certified Mail #

P 735 586 637

Dated at City and County of San Francisco, California, this ~~6th~~ day of ~~February~~, 19~~89~~.

for Wylie Rhodman, Secretary
Pesticides and Toxics Branch
Toxics & Waste Management Division
EPA, Region 9

UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 9

IN RE:	DOCKET No. TSCA-09-88-0023
BECKMAN INSTRUMENTS, INC. (BECKMAN, INC.)	CONSENT AGREEMENT AND
Respondent.	FINAL ORDER

I

This administrative proceeding for the assessment of a civil penalty was initiated pursuant to Section 16(a) of the Toxics Substances Control Act, as amended (TSCA), (15 U.S.C. 2615(a). The action was instituted by a Complaint and Notice of Opportunity for Hearing (Complaint) issued in 1988. The Complaint charged Beckman Instruments, Inc. (Respondent) with the violation of 40 C.F.R. 761.30(a), 761.40(j), 761.60, 761.180(a) and Section 15(1)(C) of TSCA (15 U.S.C. 2614(1)(C)) at the facility owned by Respondent located at Fullerton, California (Facility). Complainant is the United States Environmental Protection Agency (EPA), Region 9.

II

Respondent and Complainant admit and agree that the Regional Administrator, EPA Region 9, has jurisdiction of the subject matter of the action set out in the Complaint and over the parties thereto, pursuant to 15 U.S.C. 2615 and 40 C.F.R 22.04(a).

III

This Consent Agreement and Final Order are entered into in order to avoid the costs of litigating the disputed allegations contained in the Complaint. By entering into this Consent Agreement, Respondent does not admit the specific factual allegations made in the Complaint, or that Respondent's operations violated any provision of TSCA, the regulations contained in 40 CFR Part 761 or any other law or regulation. Respondent hereby waives any rights which it may have to a hearing on any issues resulting from the Complaint. Respondent consents to the issuance of this Consent Agreement and Final Order without adjudication.

IV

Complainant waives whatever rights it may have to compel Respondent to answer or otherwise defend the Complaint. The Complainant and Respondent agree that this Consent Decree and Final Order resolves all allegations set forth in the Complaint.

V

Respondent agrees to perform as follows:

A. Within 30 days after the execution of this Consent Agreement and entry of the attached Final Order, Respondent shall submit payment in the amount of Seven Thousand Dollars ($7,000.00). This payment shall be sent to:

EPA - Region 9
Regional Hearing Clerk
P.O. Box 360863M
Pittsburgh, PA 15251

A copy of the check shall be sent to the address specified for EPA in Section VII below.

B. No later than December 31, 1989, Respondent shall submit

to Complainant evidence that the remaining PCB transformers at the facility have been removed and properly disposed of. This evidence shall consist of copies of hazardous waste manifests or equivalent documentation showing the dates the transformers were removed from the Facility and placed on to transport for storage or disposal.

C. Respondent agrees to use its best efforts to operate the Facility in compliance with all applicable requirements of TSCA and the implementing regulations and agrees to the following:

1) All future reports of PCB Transformer inspections will clearly identify the person performing the inspection.

2) To submit photographs showing that the means of access to the three (3) PCB Transformers listed in the complaint have been marked with PCB Caution Label, M_L.

3) To provide written certification that the PCB residues from the Transformer identified in the Complaint as leaking have been cleaned up according to 40 C.F.R. Part 761.

4) To submit a photocopy of the 1987 Annual Document for the Facility.

5) To operate the Facility in full compliance with Section 6(e) of TSCA (15 U.S.C. 2605) and the implementing regulations.

Items to be submitted to EPA shall be mailed within 30 days after the execution of this Consent Agreement and Final Order.

D. If Respondent fails to perform as required by paragraphs A,B, and C above, Respondent shall pay an additional penalty of $25,000.

VI

In the event Respondent is unable to complete a task described in Article V in the time frame specified, Complainant will grant a reasonable time extension upon Respondent's written

request, provided Respondent can demonstrate to Complainant's reasonable satisfaction that Respondent has used its best efforts to meet the time frame in question.

VII

All information required to be submitted to Complainant under this Consent Agreement and Final Order (other than the payment of civil penalty) shall be addressed as follows:

Section Chief
Toxics Section, T-5-2
Toxics and Waste Management Division
U.S. Environmental Protection Agency, Region 9
215 Fremont Street
San Francisco, CA 94105

VIII

This Agreement does not relieve Respondent from compliance with monitoring and from enforcement actions for TSCA violations not addressed by this Agreement, including but not limited to all non-civil enforcement actions, or from enforcement actions under laws administered by State or local environmental authorities, except where TSCA would pre-empt such laws and the specific violations are governed by the Agreement. However, Complainant agrees that it will not initiate any other administrative proceeding or any civil action against Respondent based solely upon the inspection of the Facility conducted on or about September 22, 1987.

IX

In executing this Consent Agreement and Final Order, Respondent agrees to pay the civil penalty in accordance with the conditions and time frames specified in the FINAL ORDER set forth below. In accordance with the Debt Collection Act of 1982 and

U.S. Treasury (TFRM 6-8000), payment must be received within 30 days after the execution of this Consent Agreement and Final Order to avoid additional charges. If not received, interest will accrue from the date of execution at the current interest rate published by the U.S. Treasury. A late penalty charge of $20.00 will be imposed with an additional charge of $10.00 for each subsequent 30-day period. A 6% per annum penalty will be applied on any principal amount not paid within 90 days of the due date. In addition, if payment is not made within the required time frame, Respondent shall be liable for the additional civil penalty of $25,000.00, as specified in the FINAL ORDER below.

X

Upon completion of the requirements of Article V of this agreement and payment of all penalties due, the Respondent may move to terminate this agreement.

XI

Complainant and Respondent consent to the entry of this Agreement and Final Order without further notice.

Respondent
Beckman Instruments, Inc.

10/10/88
Date

Bert Sike
Manager, Plant Engineering

Complainant
U.S. Environmental
Protection Agency

2-1-89
Date

Jeff Zelikson
Director
Toxics and Waste
Management Division

FINAL ORDER

IT IS HEREBY ORDERED that this Consent Agreement and Final Order (Docket No. TSCA-09-88-0023) be entered and Respondent shall pay by cashier's check or certified check made payable to the Treasurer, United States of America, within thirty (30) days after the execution of this Consent Agreement and Final Order, and addressed as follows:

EPA - Region 9
Regional Hearing Clerk
P.O. Box 360863M
Pittsburgh, PA 15251

a civil penalty in the amount of SEVEN THOUSAND DOLLARS. A copy of the check shall be sent to the EPA Region 9 addressed specified in Article VII above within thirty (30) days after the execution of this Consent Agreement and Final Order. In the event Complainant determines that Respondent has failed to complete all of the tasks identified in Article V above within the specified time frames, Respondent shall pay an additional civil penalty of Twenty-Five Thousand Dollars, which shall be due within fifteen (15) days after Respondent's receipt of an order of non-remittance. Such balance shall be paid by cashier's check or certified check, made payable to the Treasurer, United States of America, and sent to the Pittsburgh address specified above.

This order shall become effective immediately.

2.1.89
Date

for DANIEL W. MCGOVERN
Regional Administrator
US EPA
Region 9

2500 Harbor Boulevard, Box 3100, Fullerton, CA 92634-3100

F/EPA
PCB
Penalty Notice

BECKMAN

Office of General Counsel
(714) 871-4848

October 19, 1989

Section Chief
Toxic Section, T-5-2
Toxic and Waste Management Division
U.S. Environmental Protection Agency,
Region IX
215 Fremont Street
San Francisco, CA 94105

RE: BECKMAN INSTRUMENTS, INC.
DOCKET NO. TSCA-09-88-0023

Gentlemen:

The Consent Agreement and Final Order relating to this matter require Beckman to provide evidence by December 31, 1989 that the remaining PCB transformers at the facility have been removed and properly disposed of. The requirement, as stated in Section V.B. of the Consent Agreement, is that Beckman must submit copies of hazardous waste manifests or equivalent documentation showing the dates the transformers were removed from the facility and placed onto transport for storage or disposal.

Enclosed with this letter are copies of hazardous waste manifests demonstrating that the required work has been performed. Manifest No. 88464515 shows that the three transformers were removed from Beckman's facility and accepted for transportation to the American Environmental facility in Rancho Cordova, California on July 1, 1989, and reached that facility on July 5, 1989. American Environmental has advised Beckman that (1) the transformer casings were transported from the American Environmental facility to the Chemical Waste Management, Inc. facility in Kettleman City, California for disposal under Manifest No. 88442365, and (2) the PCB liquids were transported from the American Environmental facility to the Ensco, Inc. facility in El Dorado, Arkansas for disposal under Manifest Nos. AR391401 and AR391431.

Beckman Instruments believes that it has fulfilled all of its obligations under the Consent Agreement and Final Order. If you have any questions or disagree with this conclusion, please contact me at the letterhead address or by telephone at (714) 773-6907.

Sincerely,

Jack E. Sorokin

Jack E. Sorokin
Associate Counsel

JES982/dd

cc: Robert W. Bergstrom, Esq.
Assistant Regional Counsel
U.S. EPA, Region IX
San Francisco, CA

Mr. Bert Sike
Manager, Plant Engineering
Beckman Instruments, Inc.
Fullerton, CA

...roved OMB No. 2050—0039 (Expires 9-30-91)

...print or type. *(Form designed for use on elite (12-pitch typewriter).*

Toxic Substances Control Division
Sacramento, California

86-4515

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD 008254708
Manifest Document No.: 00001
2. Page 1 of 1

Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address: Beckman Instruments, 2500 Harbor Blvd., Fullerton, CA 92634

4. Generator's Phone: (714) 773-7929

A. State Manifest Document Number: 88464515

B. State Generator's ID: HYHQ 35005332

5. Transporter 1 Company Name: AMERICAN ENVIRONMENTAL
6. US EPA ID Number: CAD 980884183

C. State Transporter's ID: 007631

D. Transporter's Phone: 714 826 6320

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Transporter's ID:

F. Transporter's Phone:

9. Designated Facility Name and Site Address: AMERICAN ENVIRONMENTAL, 11855 White Rock, Rancho Cordova, CA 95670
10. US EPA ID Number: CAD 980884183

G. State Facility's ID:

H. Facility's Phone: 714 826 6320

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. (RQ) waste Hazardous substance, liquid n.o.s. NA9188 PCB Transformers	003	CM	32270	P	State 261; EPA/Other N/A
b. (RQ) waste Hazardous substance, solid n.o.s. NA 9188	001	DM	00250	P	State 261; EPA/Other N/A
c.					State; EPA/Other
d.					State; EPA/Other

J. Additional Descriptions for Materials Listed Above
a. 3 PCB transformers; 1 x 455 gal, 1 x 420 gal, 1 x 240 gal.
b. 55 gallon drum containing concrete + dirt contaminated with PCB oil

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
wear appropriate personal protective equipment for handling polychlorinated biphenyls.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Lessly A. McCurley	Lessly McCurley	07	01	89

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
ANDREW DINO PASSARELLI	[signature]	07	01	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-86) Previous editions are obsolete.

Do Not Write Below This Line

Blue: GENERATOR SENDS THIS COPY TO DOHS WITHIN 30 DAYS
To: P.O. Box 400, Sacramento, CA 95812-0400

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-91)
Please print or type. *(Form designed for use on elite (12-pitch typewriter).*

Department of Health Services
Toxic Substances Control Division
Sacramento, California

88464515

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
CAL000128111			

GENERATOR

3. Generator's Name and Mailing Address

4. Generator's Phone ( )

A. State Manifest Document Number: 88464515

B. State Generator's ID: H

5. Transporter 1 Company Name: AMERICAN ENVIRONMENTA
6. US EPA ID Number: CAD981084183
C. State Transporter's ID
D. Transporter's Phone: 7148266320

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address: AMERICAN ENVIRONMENTAL, 4855 WHITE ROCK, RANCHO CORDOVA, CA 95670
10. US EPA ID Number: CAD980884183
G. State Facility's ID: CAD981084183
H. Facility's Phone: 7148266320

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.					State / EPA/Other
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above

K. Handling Codes for Wastes Listed Above: a. 14 b. 14 c. d.

15. Special Handling Instructions and Additional Information

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
		10	11	17

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
ANDREW DINO RASSARELLI		10	10	84

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
STEVEN HAGER		10	10	84

Do Not Write Below This Line

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

88464515

AMERICAN
ENVIRONMENTAL MANAGEMENT CORP.

Beckman Instruments
2500 Harbor Blvd.
Fullerton, California 92634

24 July 1989

Dear Sir/Madam:

This letter is to inform you that American Environmental Management Corporation is an approved Hazardous Waste Facility and has the appropriate permits to accept the waste material on California Uniform Hazardous Waste Manifest 88464515.

All waste streams received at our facility are accepted contingent to our waste acceptance criteria and waste analysis plan.

American Environmental Management Corporation looks forward to servicing your hazardous waste management needs. If you should require further assistance please call our Northern California facility at (916) 985-6666.

Sincerely,

AMERICAN ENVIRONMENTAL MANAGEMENT CORPORATION

SEP 22 '89 13:56 AMER ENV MGT CORP

State of ... Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-91)
Please print or type. (Form designed for use ... lite (12-pitch typewriter).

Department of Health Servic
Toxic Substances Control Divis
Sacramento, Califor

74

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
CAD980884188	10936		

3. Generator's Name and Mailing Address
American Environmental Management Corporation
11855 White Rock Road, Rancho Cordova, CA 95742

4. Generator's Phone (916) 985-6666

A. State Manifest Document Number: 88442365
B. State Generator's ID:

5. Transporter 1 Company Name: American Environmental Mgmt.
6. US EPA ID Number: CAD980884188
C. State Transporter's ID: 0097
D. Transporter's Phone: (916) 985-6666

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID:
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Chemical Waste Management, Inc.
35251 Old Skyline Blvd.
Kettleman City, CA 93239
10. US EPA ID Number: CAT000646117
G. State Facility's ID: CAT000646117
H. Facility's Phone: (800) 222-2964

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Substance Solid, NOS ORM-E NA9188	010	CM	21112	P	State 261 EPA/Other RCRA
b.					State / EPA/Other
c.					State / EPA/Other
d. PCB					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
A: Profile #657523 - Transformers drained and flushed. See attached decomissioning sheets.

K. Handling Codes for Wastes Listed Above
a. 03
b.
c.
d.

15. Special Handling Instructions and Additional Information
Wear protective clothing when handling material.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Cherri Guerrero		07	18	89

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
Steve M. Schultz		07	18	89

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space
APR
11.A INCORRECT D.O.T. C/R/W

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year
ALAN MANEY	Alan Maney	07	18	89

GENERATOR
TRANSPORTER
FACILITY

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

88442365

DHS 8022 A (1/88)
EPA 8700—22
(Rev. 9-88) Previous editions are obsolete.

Do Not Write Below This Line

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DA

P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-[illegible]-7444

Please print or type (Form designed for [illegible] on elite (12-pitch) typewriter.)

Form Approved OMB No. 2050-0039. Expires 9-30

AR 12-88

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: C A D 9 8 0 8 8 4 1 8 3 1 0 9 7 0
Manifest Document No:
2. Page 1 of 1
Information in the shaded areas is not required by Federal law.

GENERATOR

3. Generator's Name and Mailing Address
American Environmental Management Corporation
11855 WHite Rock Road, Rancho Cordova, CA 95742
4. Generator's Phone (916) 9885-6666

A. State Manifest Document Number: AR-391401
B. State Generator's ID:

5. Transporter 1 Company Name: Stamco Trucking
6. US EPA ID Number: C A D 0 6 3 5 4 7 9 9 6
C. State Transporter's ID: PC 930 H 240
D. Transporter's Phone: (408) 683-2395

7. Transporter 2 Company Name:
8. US EPA ID Number:
E. State Transporter's ID: PC ____ H ____
F. Transporter's Phone:

9. Designated Facility Name and Site Address
Ensco, Inc.
American Oil Road
El Dorado, AR 71730
10. US EPA ID Number: A R D 0 6 9 7 4 8 1 2 5
G. State Facility's ID:
H. Facility's Phone: (501) 862-1663

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No
a. RQ Hazardous Substance Liquid, NOS ORM-E NA9188 (Polychlorinated Biphenyls)	0 0 1	T T	4375 ~~4875~~	LM P	731/PCB
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
A: PCB Liquid greater than 500PPM 4875 gallons
E.H. #1-2025
if no alternate TSDF, return to generator IIA 44200

K. Handling Codes for Wastes Listed Above

EMERGENCY RESPONSE INFORMATION:
Cherri Guerrero
916-9885-6666

15. Special Handling Instructions and Additional Information
Wear protective clothing when handling material. Dike and contain all spill.
Load #53781

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment, OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name: Cherri Guerrero
Signature: Cherri Guerrero
Month Day Year: 0 7 2 8 8 9

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: Paul Bell
Signature: Paul Bell
Month Day Year: 10 12 2 8 9

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name:
Signature:
Month Day Year:

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name: T. Ellis
Signature:
Month Day Year: 1 8 3 8 9

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

NOTICE: THE ORIGINAL AND NOT LESS THAN TWO (2) COPIES MUST MOVE WITH THE HAZARDOUS WASTE SHIPMENT. ONCE DELIVERED, THE TREATMENT/STORAGE/DISPOSAL FACILITY MUST RETURN THIS ORIGINAL COPY TO THE GENERATOR.

Telephone 501-562-7444

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. | Manifest Document No. | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
American Environmental Management Corporation
11855 White Rock Road, Rancho Cordova, CA 95670
4. Generator's Phone (916) 985-6666

A. State Manifest Document Number: AR-391431
B. State Generator's ID:

5. Transporter 1 Company Name: Stance Trucking | 6. US EPA ID Number
C. State Transporter's ID: 006627 PC ____ H ____
D. Transporter's Phone: (408) 683-2355

7. Transporter 2 Company Name | 8. US EPA ID Number
E. State Transporter's ID: PC ____ H ____
F. Transporter's Phone:

9. Designated Facility Name and Site Address: Ensco, Inc.
American Oil Road
El Dorado, AR 71730 | 10. US EPA ID Number
G. State Facility's ID:
H. Facility's Phone: (501) 862-1663

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. RQ Hazardous Substance Liquid, NOS (Polychlorinated Biphenyls)	001	TT	47,500	P	731/PCB
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
A: PCB Liquid greater than 500 ppm ------
-4753 gallons. ER #1-2025 Lead #54393

K. Handling Codes for Wastes Listed Above

EMERGENCY RESPONSE INFORMATION:

If no alternate TSDF, return to generator — Emergency Contact: Cherri Pedra (916) 985-6666

15. Special Handling Instructions and Additional Information
Nevada Permit - NV1-016-PCB
Wear protective clothing when handling material. Dike and contain all spills.

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
Cherri Pedra				

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

EPA Form 8700-22 (Rev. 9-88) Previous edition is obsolete.

GENERATOR INITIAL COPY

89 09/22 08:13 P03 *

Appendix G

PCB Documentation

e2 environmental

BECKMAN COULTER, INC.
4300 n. Harbor Blvd. Fullerton, CA 92834

PCB Annual Document for Calendar Year 2006
Item Removed from Service

Items Removed	Removed from Service	Placed into Storage for Disposal	Placed into Transport for Disposal	PCB's&PCB Items in containers	PCB No. Transformers and weight Of PCB's	PCB No. high and low Volt Capacitor
PCB Light Ballasts	8/17/06	8/17/06	8/17/06	150*	0	0
PCB Light Ballasts	12/14/06	12/14/06	12/14/06	100*	0	0

*This weight in kilograms is the total weight of drums containing light ballasts and packing material. Our facility does not have information on the weight of PCB's in the light ballasts alone.

FACILITY INFORMATION

Location of initial storage or disposal facility and the name of the owner or operator of the facility:
See attached manifest

ITEMS IN SERVICE AT THE END OF THE YEAR

Item	Wt in Kilograms of PCB's and PCB Items in Containers	Number of PCB Transformers and weight of PCB's	Number of PCB high or low Volt Capacitors
0	0	0	0

State of California—Environmental Protection Agency
Form Approved OMB No. 2050-0039 (Expires 9-30-99)
Please print or type. Form designed for use on elite (12-pitch) typewriter.

See Instructions on back of page 6.

Department of Toxic Substances Control
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No.: CAD008254708 | Manifest Document No.: 55775 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
BECKMAN COULTER INC
4300 HARBOR BLVD
M/S F-11-D
FULLERTON, CA 92834

4. Generator's Phone: (714) 773-8541

A. State Manifest Document Number: 24655775

B. State Generator's ID:

5. Transporter 1 Company Name: VEOLIA ES TECHNICAL SOLUTIONS
6. US EPA ID Number: NJD080631369

C. State Transporter's ID [Reserved.]:

D. Transporter's Phone: (973) 347-7111

7. Transporter 2 Company Name:
8. US EPA ID Number:

E. State Transporter's ID [Reserved.]:

F. Transporter's Phone:

9. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS
5736 WEST JEFFERSON STREET
PHOENIX, AZ 85043

10. US EPA ID Number: AZ0000337360

G. State Facility's ID:

H. Facility's Phone: (602) 233-2966

11. US DOT Description (including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste Number
a. RQ, POLYCHLORINATED BIPHENYLS, SOLID, (UNIQUE ID#BC001 OSD 05/20/2006), 9, UN3432, II, (PCB'S)	001	DM	00150	K	State: 261 / EPA/Other: NONE
b.					State: / EPA/Other:
c.					State: / EPA/Other:
d.					State: / EPA/Other:

J. Additional Descriptions for Materials Listed Above
A) S/- ERG:171 W:328692 A:SLM-235740 1X55 OSD 8/17/06

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
EMERGENCY NUMBER-INFOTRAC: 1-800-535-5053 - INFOTRAC ACCOUNT #96072

16. **GENERATOR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

Printed/Typed Name	Signature	Month	Day	Year
CHRIS ZDUNIEWICZ		08	17	06

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year
DAVID MONTEMAYOR		08	17	06

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month	Day	Year

DO NOT WRITE BELOW THIS LINE.

/99)

Yellow: GENERATOR RETAINS

GENERATOR

IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA, CALL 1-800-852-7550

24655775

PACKING SUMMARY

Generator Number: 402630
BECKMAN COULTER,INC
4300 HARBOR BLVD
FULLERTON, CA 92834
Attn: CHRIS ZDUNKIEWICZ
EPA ID:CAD008254708

Manifest Number: 24655775
Field System ID: XC
Work Order Number: 0672221000
Date Shipped: 08/17/2006

Container#: XC-0672221000-001 Waste Area: Manifest Page/Line: 01 / A

WIP: 328692 DisposalCode: SLM-236740 PHY State: S

Date Accumulated: 08/17/2006 Gen Drum ID:

Shipping Name: RQ, POLYCHLORINATED BIPHENYLS, SOLID, (UNIQUE ID#BC001 OSD 05/20/2006), 9, UN3432, II, (PCB'S)

No. of Commons: 01 Outer Container: 55IA2-DM 001 / Smaller Container:

Primary Waste Codes: NONE,261 PCB Serial #: OOS Date: / /

Total Cmns Wt: 300 SIC: 3841 Source: G13 Form: W219 System: H010 Cubic Ft.: 7.50

Individual Common Weights: 1 @ 300 (POUNDS)

Units	Container Size	Net Weight	Chemical Name	EPA/State Codes
1	55 GAL		PCB LIGHT BALLASTS (PCB'S= 200PPM) [100%]UNIQUE ID# BC0001 OSD 05/20/2006	NONE, 261

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(800) 535-5053	000048482 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER INC
4300 HARBOR BLVD
M/S F-11-D
FULLERTON, CA 92834

Generator's Phone: 714 773-8541

Generator's Site Address (If different than mailing address)
BECKMAN COULTER INC
4300 HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD986063136

7. Transporter 2 Company Name
U.S. EPA ID Number:

8. Designated Facility Name and Site Address
VEOLIA ES TECHNICAL SOLUTIONS
5739 WEST JEFFERSON STREET
PHOENIX, AZ 85043
Facility's Phone: 602 233-2665
U.S. EPA ID Number: AZD000033736

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (If any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN3432, II, (PCB'S)	001	DM	00100	K	NONE / 261
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
1) W 320002 A SLM 235740DRT 1056 + ADDENDUM ATTACHED FOR ADDITIONAL TSCA INFORMATION - INFOTRAC ACCOUNT #80072 OSD 12/14/06

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: CHRIS ZDUNKIEWICZ
Signature:
Month 12 Day 14 Year 06

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: DAVID MANNING
Signature:
Month 12 Day 14 Year 06

Transporter 2 Printed/Typed Name:
Signature:
Month Day Year

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number:
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name:
Signature:
Month Day Year

8700-22 (Rev. 3-05) Previous editions are obsolete.

GENERATOR'S INITIAL COPY

PACKING SUMMARY

Generator Number: 402630
BECKMAN COULTER,INC
4300 HARBOR BLVD
FULLERTON, CA 92834
Attn: CHRIS ZDUNKIEWICZ
EPA ID: CAD008254708

Manifest Number: 000048482VES
Field System ID: XC
Work Order Number: 0732966000
Date Shipped: 12/14/2006

Container#: XC-0732966000-001 Waste Area: Manifest Page/Line: 01 / 1

WIP: 328692 DisposalCode: SLM-235740DRT PHY State: S

Date Accumulated: 12/19/2006 Gen Drum ID:

Shipping Name: RQ, POLYCHLORINATED BIPHENYLS, SOLID, 9, UN3432, II, (PCB'S)

No. of Commons: 01 Outer Container: 55IA2-DM Inner Container:

Primary Waste Codes: NONE,261 PCB Serial #: 07329660001 OOS Date: 12/08/2006

Total Cmns Wt: 100 SIC: 3841 Source: G13 Form: W219 System: H010 Cubic Ft.: 7.50

Individual Common Weights: 1 @ 100 (KILOGRAMS)

Units	Container Size	Net Weight	Chemical Name	EPA/State Codes
1	55 GAL		PCB LIGHT BALLASTS (PCB'S>200PPM) [100%]	NONE, 261

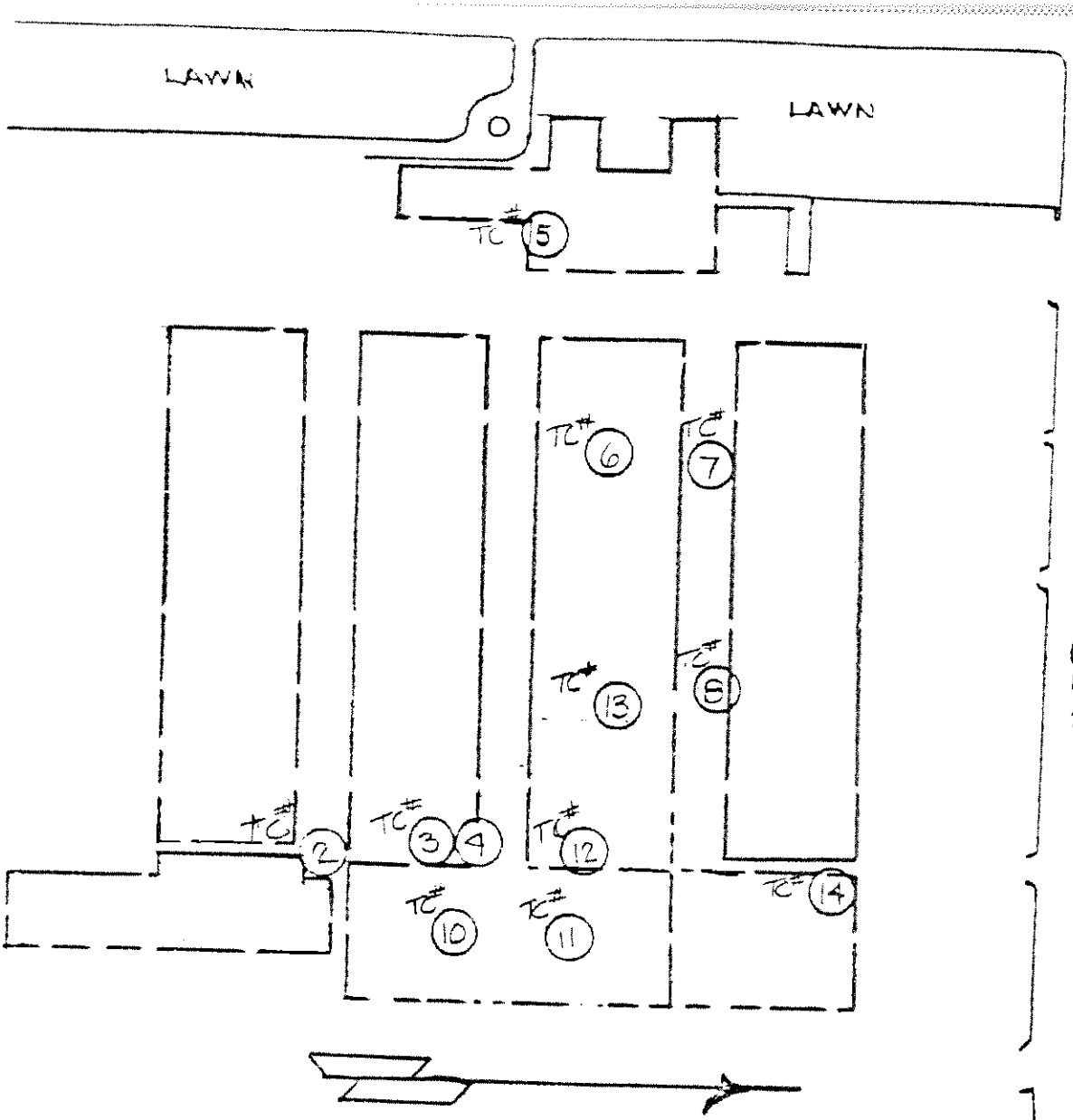
ia ES, Technical Services L.L.C.

ADDENDUM TO MANIFEST TRACKING NUMBER

000048482VES

NERATOR : 402630 - BECKMAN COULTER,INC | EPA ID : CAD008254708 | GEN DOC NUM : 48482 | DATE SHIPPED: 12/14/2006

est #	WP #	WP Description	Approval #	Physical State / Hazard Codes	Waste Codes	Container count & size	Generator Drum ID	Veolia Drum #	PCB Container Number	DOSD
1	328692	PCB LIGHT BALLASTS	SLM-235740DRT	S/-	NONE, 261	1x55 GAL		1	07329660001	12/08/2006



T.C.#	BLDG.	COL.	MFR.	SERIAL NO.	KVA	NAME PLATE GALLONS	NAME PLATE WT. OF LIQUID	TRADE NAME OF LIQUID
5	1	37	G.E.	B975604	300	250	3300	#1470 PYRANOL
6	2	26	G.E.	B975273	300	250	3300	#1470 PYRANOL
13	2	12	G.E.	B975270	300	250	3300	#1470 PYRANOL
12	2	4	G.E.	B975287	225	210	2750	"
11	3	H	ITE	9410-62	1000	420	5500	"
10	3	O	G.E.	B975272	300	250	3300	#1470 PYRANOL
3	4	4	G.E.	C-856375	1000	380	5000	"
4	4	4	G.E.	C-856374	1000	380	5000	"
7	5	27	WEST	7372815	1000	455	5800	INERTEEN
8	5	15	ITE	9473-62	1000	420	5500	
2	6	V-3	SQD	35427	750	240	3140	AROCLOR #4
14	8	M-3	G.E.	B975271	300	250	3300	#1470 PYRANOL
				TOTAL		3755 GAL.	49190 LBS	= 22312.534 KILOGRAMS

INTER-OFFICE MEMORANDUM

FEB 24 1989 1987

BECKMAN

RECEIVED

MAY 11 1989

PLANT ENGINEERING

TO: B. Sike

DATE: February 23, 1989

FROM: J. E. Sorokin

cc: W. Davis
J. Palmerino

SUBJECT: PCB Violation Follow Up

Now that resolution of the alleged PCB violations has been substantially completed, I wanted to address the major continuing requirements applicable to the three remaining PCB transformers. As you know, under the Consent Order, these transformers must be removed by the end of 1989. Until they are removed, and for a period afterwards, there will be several ongoing requirements.

The regulations require PCB transformers to be inspected periodically and records kept of the inspection. In addition, in the Consent Order, Beckman agreed that the records of all future inspections would clearly identify the person performing the inspection. If the containment structures surrounding the transformers can contain at least 100% of the transformer volume, they only need to be inspected once per year. Otherwise they need to be inspected quarterly. Inspection records for each transformer must be retained for a period of at least three years after the end of the year in which the transformer is disposed of.

Assuming the containment structures surrounding the three remaining transformers can contain at least 100% of the transformer volume, your staff will need to ensure that the transformers were inspected at least once in 1988 and are inspected at least once in 1989, with the inspections at least 180 days apart. The inspections should be appropriately documented. The previously prepared inspection report forms should be suitable for these inspections, provided they are modified to reflect that these are annual inspections. In order to clearly identify the person who performed the inspection, the person should print his name on the form and then sign and date it.

The regulations also require the preparation of an Annual Document detailing the disposition of PCB items. The Annual Document for each calendar year must be completed by July 1 of the following year. Last July, I prepared the Annual Document for 1987, since the relevant records were in my possession at the time. I have now returned these records to you, and your staff should undertake to prepare the required 1988 report by the July 1 due date. Enclosed is a copy of the format I used for the 1987 document and a copy of the applicable regulations.

Your staff also will need to complete an Annual Document by July 1, 1990 for activities conducted in 1989. Documents for subsequent years will depend on the activities conducted. The completed Annual Document should be retained in your files until requested by the EPA. All Annual Documents must be retained for at least five years after the year in which the facility last used PCB items.

Please call me if you have any questions on these requirements.

Jack E. Sorokin
Associate Counsel

JES9072

Enclosures

where EPA believes the spill to have been the result of gross negligence or knowing violation.

Subparts H and I [Reserved]

Subpart J—Records and Reports

§ 761.180 Records and monitoring.

This section contains recordkeeping and reporting requirements that apply to PCBs, PCB Items, and PCB storage and disposal facilities that are subject to the requirements of the part.

(a) *PCBs and PCB Items in service or projected for disposal.* Beginning July 2, 1978, each owner or operator of a facility using or storing at one time at least 45 kilograms (99.4 pounds) of PCBs contained in PCB Container(s) or one or more PCB Transformers, or 50 or more PCB Large High or Low Voltage Capacitors shall develop and maintain records on the disposition of PCBs and PCB Items. These records shall form the basis of an annual document prepared for each facility by July 1 covering the previous calendar year. Owners or operators with one or more facilities that use or store PCBs and PCB Items in the quantities described above may maintain the records and documents at one of the facilities that is normally occupied for 8 hours a day, provided the identity of this facility is available at each facility using or storing PCBs and PCB Items. The records and documents shall be maintained for at least five years after the facility ceases using or storing PCBs and PCB Items in the prescribed quantities. The following information for each facility shall be included in the annual document:

(1) The dates when PCBs and PCB Items are removed from service, are placed into storage for disposal, and are placed into transport for disposal. The quantities of the PCBs and PCB Items shall be indicated using the following breakdown:

(i) Total weight in kilograms of any PCBs and PCB Items in PCB Containers including the identification of container contents such as liquids and capacitors;

(ii) Total number of PCB Transformers and total weight in kilograms of any PCBs contained in the transformers; and

(iii) Total number of PCB Large High or Low Voltage Capacitors.

(2) For PCBs and PCB Items removed from service, the location of the initial disposal or storage facility and the name of the owner or operator of the facility.

(3) Total quantities of PCBs and PCB Items remaining in service at the end of the calendar year using the following breakdown:

(i) Total weight in kilograms of any PCBs and PCB Items in PCB Containers, including the identification of container contents such as liquids and capacitors;

(ii) Total number of PCB Transformers and total weight in kilograms of any PCBs contained in the transformers; and

(iii) Total number of PCB Large High or Low Voltage Capacitors.

(b) *Disposal and storage facilities.* Each owner or operator of a facility (including high efficiency boiler operations) used for the storage or disposal of PCBs and PCB Items shall by July 1, 1979 and each July 1 thereafter prepare and maintain a document that includes the information required in paragraphs (b)(1) through (4) of this section for PCBs and PCB Items that were handled at the facility during the previous calendar year. The document shall be retained at each facility for at least 5 years after the facility is no longer used for the storage or disposal of PCBs and PCB Items except that in the case of chemical waste landfills, the document shall be maintained at least 20 years after the chemical waste landfill is no longer used for the disposal of PCBs and PCB Items. The documents shall be available at the facility for inspection by authorized representatives of the Environmental Protection Agency. If the facility ceases to be used for PCB storage or disposal, the owner or operator of such facility shall notify within 60 days the EPA Regional Administrator of the region in which the facility is located that the facility has ceased storage or disposal operations. The notice shall specify where the documents that are required to be maintained by this paragraph are located.

The following inform
cluded in each docum
(1) The date wher
PCB Items were recei
ty during the previo
for storage or disposa
tion of the facility a
operator of the faci
the PCBs were receive
(2) The date when
PCB Items were dispo
posal facility or transf
disposal or storage fa
the identification of t
of PCBs and PCB I
stored or disposed of;
(3) A summary of th
kilograms of PCBs ar
in containers and the
PCBs contained in PC
that have been handle
during the previous
This summary shall p
the above PCBs and P
have been:
(i) Received during th
(ii) Transferred to
during the year; and
(iii) Retained at the
end of the year. In ad
tents of PCB Containe
tified. When PCB C
PCBs contained in a t
transferred to other st
al facilities, the identi
facility to which such
Items were transferred
ed in the document.
(4) Total number of
cles or PCB Equipmer
Containers, received du
dar year, transferred to
or disposal facilities du
dar year, or remaining
site at the end of the
The identification of th
of PCB Articles and P
received, transferred, or
the facility site shall
When PCB Articles an
ment are transferred to
or disposal facilities, the
of the facility to which
cles and PCB Equipme
ferred must be included.

NOTE: Any requirements
kilograms of PCBs may be
if the internal volume of
transformers is known and

BECKMAN INSTRUMENTS, INC.
2500 HARBOR BLVD
FULLERTON, CA. 92634

PCB ANNUAL DOCUMENT FOR CALENDAR YEAR 1987
ITEMS REMOVED FROM SERVICE

Items Removed	Dates Items Removed from Service	Placed into Storage for Disposal	Placed on to Transport Disposal	Weights in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers Weight of PCBs	Number of PCB High and Low Volt Capacitors
9410-62	7/18/87	7/18/87	7/18/87	0	1 @ 2494.8	0
B975272	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
B975271	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
			TOTALS	0	3 @ 5488.6kg	0

FACILITIES INFORMATION

Location of Initial Storage or Disposal Facility and the name of the owner or operator of the facility:
See attached manifest

ITEMS IN SERVICE AT END OF YEAR

Item	Wt. in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers and Weight of PCBs	Number of PCB High or Low Volt Capacitors
7372815	0	1 @ 453.6 ~~2400~~ 2630.4	0
9473-62	0	1 @ 453.6 2494.3	0
35427	0	1 @ 340.2 1424.0	0
Totals	0	3 @ 1247.4kg	0

6548.7

JES8214

2500 Harbor Boulevard, Box 3100, Fullerton, CA 92634-3100

BECKMAN

Office of General Counsel
(714) 871-4848

February 23, 1989

bcc: W. Davis
J. Palmerino
B. Sike

Section Chief
Toxics Section, T-5-2
Toxics and Waste Management Division
U.S. Environmental Protection Agency,
Region IX
215 Fremont Street
San Francisco, CA 94105

RE: BECKMAN INSTRUMENTS, INC.
DOCKET NO. TSCA-09-88-0023

Gentlemen:

Beckman and the U.S. EPA have entered into a Consent Agreement and Final Order relating to the above captioned matter which requires Beckman to submit certain materials to EPA by March 13, 1989. This letter addresses each of the items required to be supplied.

(1) Payment of Penalty. Beckman was required to pay a civil penalty in the amount of $7,000.00. A check for this payment was mailed to the address listed in the Consent Agreement on February 15, 1989. Copies of the check and cover are enclosed for your records.

(2) Photographs. Beckman was required to submit photographs showing that the means of access to three PCB transformers had been marked with PCB caution label mL. Enclosed are photographs showing that mark mL has been placed on the gates to the enclosures surrounding the three transformers. As you know, Beckman had placed these markings on the casings of the transformers. One of the issues raised in this matter was whether placement of the marking on the transformer casings constituted compliance with the requirement for marking the "means of access", where the transformer casing was clearly visible through the surrounding fence. The enclosed photographs show that the mark also has been placed on the gate to each enclosure. It is our understanding that EPA's expectation in entering into the Consent Agreement was that the mark would be placed on the gate. By taking this step, Beckman is not

conceding that its failure to place the mark on the gates to the enclosures constituted a violation of the regulations.

(3) Disposal of PCB Residues.. The Consent Agreement also requires Beckman to provide a written certification that certain PCB residues identified during an inspection on September 22, 1987 had been cleaned up in accordance with the applicable regulations. The material involved was a small amount of residue that had seeped out of a valve. Immediately following the inspection, the residue was cleaned up with rags which were treated as PCB contaminated material and disposed of accordingly. Thus, Beckman believes that the residues were cleaned up and disposed of as required by the applicable regulations.

(4) Annual Document. Finally, the Consent Agreement requires Beckman to submit a photocopy of the 1987 annual document for the facility. Enclosed is a copy of the annual document prepared for calendar year 1987.

The actions described above have been taken in a good faith effort to comply with both the letter and the spirit of the Consent Agreement, and Beckman believes that they constitute full compliance with its requirements. If EPA belives that Beckman's performance with respect to any of the actions identified above does not constitute full compliance, please contact us immediately so that we can review the matter and discuss any necessary corrective action.

Sincerely,

Bert Sike
Manager, Plant Engineering

J845

Enclosures

cc: Robert W. Bergstrom, Esq.
Assistant Regional Counsel

2500 Harbor Boulevard, Box 3100, Fullerton, CA 92634-3100

BECKMAN

Office of General Counsel
(714) 871-4848

February 15, 1989

Return Receipt Requested

EPA - Region 9
Regional Hearing Clerk
P.O. Box 360863M
Pittsburgh, PA 15251

Re: Beckman Instruments, Inc.
Docket No. TSCA -09-88-0023

Gentlemen:

Enclosed is a cashiers check in the amount of $7000.00 as payment in full of the civil penalty which Beckman Instruments, Inc. is required to pay by the Consent Agreement and Final Order entered into under this docket number. Please direct any receipt to my attention or contact me if you have any questions regarding this material.

Sincerely,

Jack E. Sorokin
Associate Counsel

JES9058

Enclosure: Security Pacific National Bank, Cashiers Check, Check No. 04963244

cc: Section Chief
Toxics Section, T-5-2
Toxics & Waste Management Division
U.S. Environmental Protection Agency,
Region 9
215 Fremont St.
San Francisco, CA 94105

Robert W. Bergstrom, Esq.
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region 9
215 Fremont St.
San Francisco, CA 94105

Mr. Bert Sike
Manager, Plant Engineering
Beckman Instruments, Inc.
Fullerton, California

SECURITY PACIFIC NATIONAL BANK
Bank Check Accounting Services
Brea, California 92621-6398

No. 04963244 16-4/1220

OFFICE NUMBER 092

DATE FEBRUARY 14 1989

PAY TO THE ORDER OF

* * * * * * * TREASURER , UNITED STATES OF AMERICA* * * * * * $7000.00* * * * * *

129830 7-86 (1)

S.P.N.B. $7000.00CTS

Cashiers Check

AUTHORIZED SIGNATURE

"04963244" :122000043:928 91701 6"

ENDORSEMENT OF CHECK ATTACHED HERETO WILL CONSTITUTE PAYEE'S RECEIPT TO BECKMAN INSTRUMENTS, INC. IN FULL SETTLEMENT OF ACCOUNT STATED BELOW

No. 215725

VENDOR NUMBER	DATE	DESCRIPTION	INVOICE OR D.M. NO.	PURCHASE ORDER	AMOUNT OF INVOICE	DISCOUNT	NET AMOUNT
	2-14-89	Payable to: Treasurer, United States of America for: consent agreement & final order (docket #TSCA-09-88-0023) civil penalty					7000.00

dixie 6907

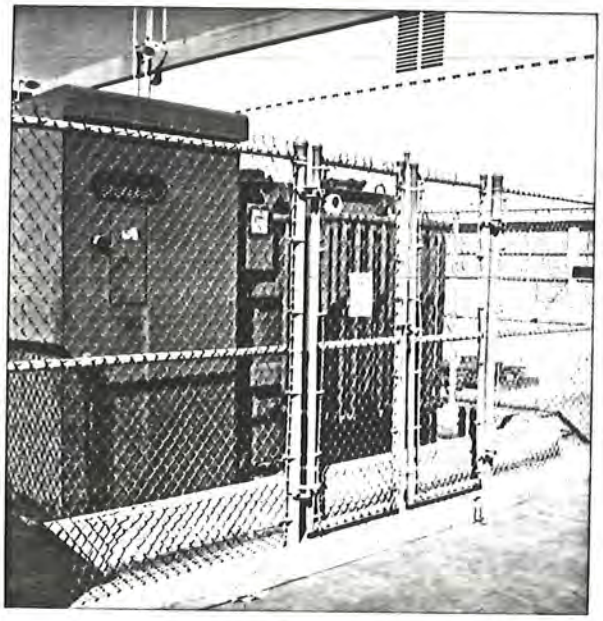
X01330.5

BECKMAN

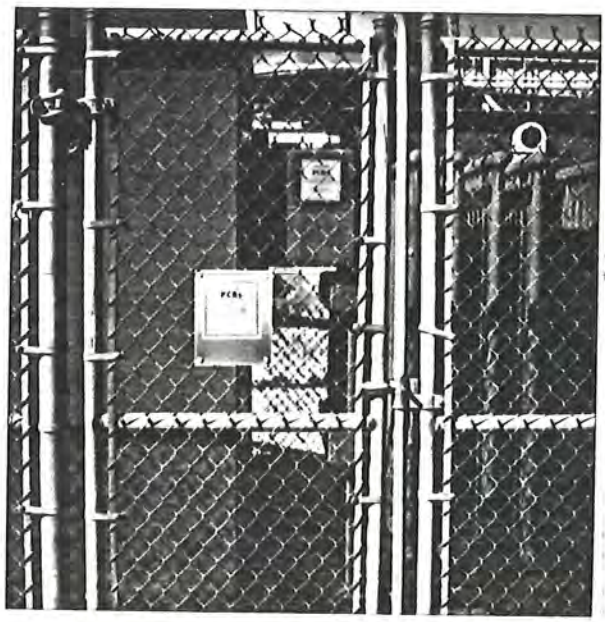
SERIAL
NO. 35427

SERIAL
NO. 35427

BECKMAN

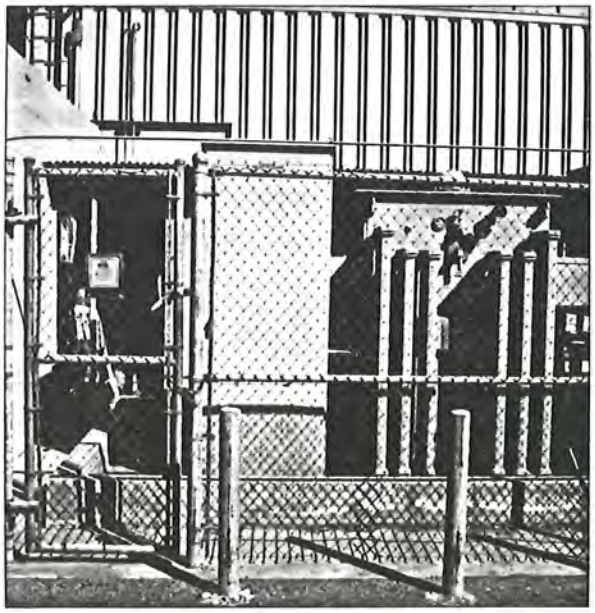


SERIAL
NO. 7372815



SERIAL
NO. 7372815

BECKMAN



SERIAL
NO. 9473-62

SERIAL
NO. 9473-62

BECKMAN INSTRUMENTS, INC.
2500 HARBOR BLVD
FULLERTON, CA. 92634

PCB ANNUAL DOCUMENT FOR CALENDAR YEAR 1987
ITEMS REMOVED FROM SERVICE

Items Removed	Dates Items Removed from Service	Placed into Storage for Disposal	Placed on to Transport Disposal	Weights in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers Weight of PCBs	Number of PCB High and Low Volt Capacitors
9410-62	7/18/87	7/18/87	7/18/87	0	1 @ 2494.8	0
B975272	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
B975271	7/18/87	7/18/87	7/18/87	0	1 @ 1496.9	0
			TOTALS	0	3 @ 5488.6kg	0

FACILITIES INFORMATION

Location of Initial Storage or Disposal Facility and the name of the owner or operator of the facility:
See attached manifest

ITEMS IN SERVICE AT END OF YEAR

Item	Wt. in Kilograms of PCBs and PCB Items in Containers	Number of PCB Transformers and Weight of PCBs	Number of PCB High or Low Volt Capacitors
7372815	0	1 @ 453.6	0
9473-62	0	1 @ 453.6	0
35427	0	1 @ 340.2	0
Totals	0	3 @ 1247.4kg	0

JES8214

Form Approved OMB No. 2050-0039 (Expires 9-30-88)

Please print or type (Form designed for use on elite (12-pitch typewriter)

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. C A D 0 0 8 2 5 4 7 0 8 | Manifest Document No. 0 0 0 0 1

2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
Beckman Instruments
2500 N. Harbor Blvd., Fullerton, CA. 92633

A. State Manifest Document Number 87325005

4. Generator's Phone (714 990-4100

B. State Generator's ID C A D 0 0 8 2 5 4 7 0 8

5. Transporter 1 Company Name: American Environmental Mgmt. Co.

6. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

C. State Transporter's ID

D. Transporter's Phone 714 826-6320

7. Transporter 2 Company Name

8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
American Environmental Mgmt. Co.
11855 White Rock Road
Rancho COrdova, CA. 95670

10. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

G. State Facility's ID

H. Facility's Phone 916 985-6666

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. "RQ" Waste Hazardous Substance, N.O.S., ORM-E NA 9188 (Containing Polychlorinated Biphenyls	003	CM	291.5C	P	State 261 / EPA/Other RCRA Exempt
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Item A: Transformer carcusses containing unknown concentrations of PCB oil

K. Handling Codes for Wastes Listed Above
a. b. c. d.

15. Special Handling Instructions and Additional Information
PVC boots and Gloves, White Tyvek, 1/2 Face Resp. and Saranex Suit on stand by
Job #5981 AEMC Approval #0231

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR — Printed/Typed Name: LELOND A. PARDE — Signature — Month Day Year: 07 16 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials
Printed/Typed Name: TRUC FRANCE — Signature — Month Day Year: 07 16 87

18. Transporter 2 Acknowledgement of Receipt of Materials
Printed/Typed Name — Signature — Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.
Printed/Typed Name — Signature — Month Day Year

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A (1/87)
EPA 8700-22
(Rev. 9-86) Previous editions are obsolete

YELLOW: GENERATOR RETAINS

INSTRUCTIONS ON THE BACK

STATE OF ARKANSAS
Department of Pollution Control and Ecology
P. O. Box 9583 Little Rock, Arkansas 72219
Telephone 501-562-7444

1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039. Expires 0

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No: CA D 9 8 0 8 8 4 1 8 3 1 — Manifest Document No: 0 4 9 9
2. Page 1 of 1 — Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address
American Environmental Management Corporation
11855 White Rock Road, Rancho Cordova, CA 95670
4. Generator's Phone (916) 985-6666

A. State Manifest Document Number: AR-106707
B. State Generator's ID: AR

5. Transporter 1 Company Name: ENSCO, INC.
6. US EPA ID Number: A R D 0 6 9 7 4 8 1 9 2
C. State Transporter's ID: AR 10 2708
D. Transporter's Phone: (501) 863-7173

7. Transporter 2 Company Name
8. US EPA ID Number
E. State Transporter's ID
F. Transporter's Phone

9. Designated Facility Name and Site Address
ENSCO, INCORPORATED
American Road
El Dorado, Arkansas
10. US EPA ID Number: A R D 0 6 9 7 4 8 1 9 2
G. State Facility's ID
H. Facility's Phone: (501) 863-7173

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. Hazardous Waste Substance, Liquid, (Polychlorinated biphenyls) ORM-E NA9188 (RQ 10/4.54)	0 0 1	T	4 5 8 2 0	P	731/PCB
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above: (4557 gals) Polychlorinated biphenyls
K. Handling Codes for Wastes Listed Above: Kevin Terrio Emergency Responder (9169856666)

if no alternate TSDF, return to generator

15. Special Handling Instructions and Additional Information
Wear protective clothing when handling material.
DIKE AND CONTAIN ALL SPILLS.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations and Arkansas state regulations.
If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month	Day	Yr
Kevin Terrio, TSD Operator		10	2	88

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Yr
H. SMITH	H. Smith	10	28	88

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month	Day	Yr

TRANSPORTER

19. Discrepancy Indication Space
Rec @ Ensco: 46,580#

FACILITY

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19

Printed/Typed Name	Signature	Month	Day	Yr
Allen Macon	Allen Macon	10	30	88

INSPECTION REPORT

U.S. ENVIRONMENTAL PROTECTION AGENCY

REGION 9

TOXICS AND WASTE MANAGEMENT DIVISION

Purpose: TSCA, Section 6 PCB Investigation

Facility: Beckman Instruments, Inc.
2500 Harbor Blvd.
Fullerton, CA 92364

EPA ID Number: CAD008254208

Report Number: T(87)E

Date of Investigation: 09/22/87

State Investigators: Clarence Berman, Assoc. Haz. Mat. Spec.
Ruth Williams, Haz. Materials Specialist

EPA Investigator: Greg Tzajkowski, Environmental Scientist

Facility Representatives: Jack Sorokin, Senior Attorney
Kathy O'Doherty, Industrial Hygienist
Lee Parde, Lead Electrician

Report Prepared By: Berman

Report Date: 10/8/87

EQUIPMENT IN USE/STORAGE FOR REUSE

INVENTORY

	Total Number of Equipment	Determination (*S/N/A)	Number in use	Number in storage for reuse	Total weight of PCBs in Kg.
Transformers:					
PCB	3	N	3	0	6556
PCB cont.	0				
Capacitors:					
PCB	0				
Other electrical equipment (specify type)					
PCB					
PCB					
PCB cont.					

*S = Confirmed by sampling
N = Identified from nameplate
A = Assumed contaminated (oil filled transformers not sampled)

COMMENTS Company manufactures scientific instruments and fabricates metal containers to house them.

YES	NO	N.A.	
			761.30(a)(1) For PCB Transformers operated by the facility:
___	_X_	___	(i) PCB Transformer(s) that pose an exposure risk to food or feed were in use or storage for reuse.
___	_X_	___	(iii) PCB Transformer(s) were installed in or near commercial buildings after Oct. 1,1985.
_X_	___	___	(vi) All PCB Transformers were registered with the primary fire response office by 12/1/85.
			(vi) The registration provided the following information to the fire response office
_X_	___	___	(A) The location of the address and physical location of the transformer.
_X_	___	___	(B) The principle constituent of the dielectric fluid.
_X_	___	___	(C) The name and telephone number of the person to contact in the event of a fire.
___	___	_X_	(vii) For PCB Transformers located in/near commercial buildings, facility had registered transformers with the owner(s) of all buildings within 30 meters, by 12/1/85.
			(vii) The registration provided the following information to building owners:
___	___	_X_	(A) The specific location of the PCB Transformers.
___	___	_X_	(B) The principle constituent of the dielectric fluid.
___	___	_X_	(C) The type and primary/secondary voltage of the transformer installation.

761.30(a)(1) USE CONDITIONS
PCB Transformer Inspection Records

	YES	NO	N.A.	
761.30(a)(1)				The facility had transformers of the following type(s):
(ix)	_X_	___	___	Containing 60,000 ppm PCB or greater. If YES, requires: Quarterly inspections (calendar yr. quarters) 30-day minimum interval.
(xiii)	_X_	___	___	Tested and found to contain 500-60,000 ppm PCB; or containing 60,000 ppm PCB and having 100% secondary containment. If YES, requires: Annual inspections with a 180 day minimum interval.
				Berms installed in 1983. See attachment 6.
				Availability of inspection records:
(xii)	___	_X_	___	All inspection records were available since 5/81 (must be maintained 3 years after disposal of transformer). If NO, the following were missing:
				See addendum, page 5 & 6.
(ix,xiii)	___	___	___	All inspections were conducted at appropriate intervals. If NO, the following discrepancies were found.
				See above entry.

COMMENTS:

erial Number	Secondary Containment ?	Missing Inspection Reports
B975604	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985 (removed 10/23/85).
B975273	No	2nd,3rd, & 4th quarter 1983 3rd & 4th quarter 1984 1st,2nd, & 3rd quarter 1985 (removed 10/23/85).
B975270	No	2nd,3rd, & 4th quarter 1983 3rd & 4th quarter 1984 1st,2nd, & 3rd quarter 1985 (removed 10/23/85).
B975287	No	2nd,3rd, & 4th quarter 1983 3rd & 4th quarter 1984 1st,2nd, & 3rd quarter 1985 (removed 10/23/85).
9410-62	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985 (removed 07/20/87).
B975272	Yes (1983)	Calendar year 1985 (removed 07/20/87).
C856375	Yes (1983)	2nd, 3rd, & 4th quarter 1983 Calendar year 1985 (removed 10/23/85).
C856374	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985 (removed 10/23/85).

Serial Number	Secondary Containment ?	Missing Inspection Reports
7372815	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985
9473-62	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985
35427	Yes (1983)	2nd,3rd, & 4th quarter 1983 Calendar year 1985
B975271	Yes (1983)	Calendar year 1985 (removed 07/20/87)

761.30(a)(1)(xii) USE CONDITIONS
Inspection Record Contents

YES	NO	N.A.		
761.30(a)(1)(xii)			All PCB Transformer inspection records included:	
(A)	X			Location of transformer.
(B)	X			Date of inspection.
(B)			X	Date leak was discovered if different from date of inspection.
(C)		X		Name of person performing inspection.
(D)	X			Location of any leak(s).
(E)	X			Estimated amount of dielectric fluid released from any leak.
(F)	X			Date of any cleanup, containment or repair.
(G)	X			Description of any cleanup, containment or repair.
(H)	X			Results of any containment and daily inspection for uncorrected active leaks.

REFERENCE COMMENTS

761.180(a) ANNUAL DOCUMENT
PCB Items In Service or Projected for Disposal

761.180(a) Facility must have an Annual Document if using or storing at one time (check all applicable):

___ 50 or more high or low voltage capacitors.

___ 99.4 lbs (45 kilograms) PCBs in containers.

_X_ 1 or more PCB Transformer(s).

YES	NO	N.A.	
___	_X_	___	Annual Document was compiled each July 1 (since 7/1/79) for previous calendar year. If NO, list discrepancies or dates for which storage/disposal document was unavailable: No Annual Documents compiled, but some information which could be used to produce an Annual Document is available.
___	___	_X_	Facility maintained Annual Document 5 years after its last use or storage of PCBs.

761.180(a) The Annual Document included:

(1) Dates when PCBs and PCB Items were:

___ ___ _X_ Removed from service.

___ ___ _X_ Stored for disposal.

___ ___ _X_ Transported for disposal.

761.180(a) The Annual Document included:

	YES	NO	N.A.	
(1)				A summary of quantities of PCBs and PCB Items removed from service at the end of the calendar year, including:
(i)	___	___	_X_	Total weight in kilograms of PCBs and PCB Items in containers, including identification of contents (e.g. soil).
(ii)	___	___	_X_	Total number of PCB Transformers and total weight in kilograms of PCBs in transformers.
(iii	___	___	_X_	Total number of PCB Capacitors.
(2)				For PCBs and PCB Items removed from service:
	___	___	_X_	Location of initial disposal or storage facility.
	___	___	_X_	Name of owner or operators of facility.
(3)				A summary of total quantities of PCBs and PCB Items remaining in service during the calendar year, including:
(i)	___	___	_X_	Total weight in kilograms of PCBs and PCB Items in containers, including identification of contents(e.g. soil).
(ii)	___	___	_X_	Total number of PCB Transformers and total weight in kilograms of PCBs in transformers.
(iii	___	___	_X_	Total number of PCB Capacitors.

COMMENTS Since no Annual Documents were prepared, all entries pertaining to Annual Documents are marked non-applicable.

YES	NO	N.A.	
___	_X_	___	Did facility store or dispose of PCBs and PCB Items?
___	___	_X_	The Annual Document was compiled each July 1(since 7/1/79) for previous calendar year. If no, list discrepancies or dates for which storage/disposal document was unavailable:
___	___	_X_	Facility maintained storage/disposal document 5 years after their last storage or disposal of PCBs.

761.180(b) The storage/disposal Annual Document included:

(1) ___	___	_X_	Dates when PCBs and PCB items were received for storage or disposal, and identification of the facility and owner/operator from whom received.
(2) ___	___	_X_	Dates when PCBs and PCB Items were disposed of at the facility or transferred to another facility (including identification of what was stored or disposed of).

(3) Summary of total weight in kilos of PCBs or PCB Articles in containers (including identification of contents) and total weight of PCBs in transformers:

(i) ___	___	_X_	Received for storage or disposal.
(ii) ___	___	_X_	Transferred to another facility (including name of new facility).
(iii) ___	___	_X_	Remaining at the facility at the close of the calendar year.

(4) Total number of PCB Articles or PCB Equipment not in containers (including specific identification of articles or equipment):

(4) ___	___	_X_	Received for storage or disposal.
(4) ___	___	_X_	Transferred to another facility(including name of new facility).
(4) ___	___	_X_	Remaining at the facility at the close of the calendar year.

§761.30, §761.40, and §761.60 USE CONDITIONS
PCB/PCB Contaminated Transformers in Use or Storage for Reuse

REF. NO.	PHOTO NUMBERS	TRANSFORMER LOCATION	TRANSFORMER MANUFACTURER	SERIAL NUMBER	FLUID TYPE	FLUID VOLUME	§761.60 (d)(1) DOES TRANSFORMER HAVE: LEAKS?	§761.60 (d)(1) DOES TRANSFORMER HAVE: SPILLS?	IF SPILL EST. SIZE OF SPILL AREA?	§761.30 (a)(viii) STORED COMBUSTIBLES IN AREA?	§761.40 (c)(1) M_L?	§761.40 (j) M_L ON ENTRY?
1		BLDG 5 WEST	WESTINGHOUSE	7377815	INERTEEN	46Sg	N	N	N.A	N	Y	N
2	1, 2	BLDG 5 EAST	ITE	947362	NON-FLAM LIQUID	470g	Y	N	N.A	N	Y	N
3		BLDG. 6	SQUARE D	35427	ASKAREL	COULD NOT DETERMINE (APPROX 40g)	N	N	N.A	N	Y	N

REF. NO. COMMENTS

1, 2, 3 NO M_L ON ACCESS DOORS, BUT M_L ON TRANSFORMERS IS EASILY VISIBLE FROM OUTSIDE THE ENCLOSURES.

YES	NO	N.A.	
			761.65
(a) ___	___	_X_	All PCB Articles or Containers placed in storage for disposal after 1/1/83 were disposed of within 1 year from the date they were first placed in storage.
			761.65(b)(1) The storage for disposal area met the following criteria:
(i) ___	___	_X_	Adequate roof and walls to prevent rain water from reaching stored PCBs/PCB Items.
(ii) ___	___	_X_	Adequate floor with a minimum 6 inch high curb, providing a containment volume of at least twice the internal volume of the largest Article/Container stored therein, or 25% of the total internal volume of all Articles/Containers stored therein, whichever is greater.
(iii) ___	___	_X_	No floor openings of any kind that would permit liquids to flow from the curbed area.
(iv) ___	___	_X_	Floors and curbing constructed of smooth and impervious materials.
(v) ___	___	_X_	Not located at a site that is below the 100-year flood water elevation.
			761.65(c)
(3) ___	___	_X_	The storage area was marked with M_L.
(4) ___	___	_X_	All contaminated moveable equipment used for handling stored PCBs/PCB Items was kept within the PCB storage area.
(5) ___	___	_X_	The facility inspects all stored PCB Articles/Containers for leaks at least once every 30 days.
(5) ___	___	_X_	All leaking PCB Articles/Containers were immediately transferred to marked (M_L) non-leaking containers.
(5) ___	___	_X_	Spilled or leaked materials were immediately cleaned up.

761.65 STORAGE FOR DISPOSAL

(Continued)

761.65(c)

	YES	NO	N.A.	
	___	___	_X_	Facility had noted on all PCB Articles and Containers the date when each item was placed into storage.
	___	___	_X_	PCB Articles and Containers were managed so that they could be located by the date they were placed into storage.
(6)	___	___	_X_	The facility used only DOT specified containers (5, 5B, 6D with 2S or 2SL, or 17E) for storage of liquid PCBs.
(6)	___	___	_X_	The facility used only DOT specified containers (5, 5B, or 17C) for storage of non-liquid PCBs.
(6)	___	___	_X_	If the facility used non-DOT specified containers for storage of non-liquid PCBs, they demonstrated that these containers provide protection from leaking and environmental exposure equivalent to that provided by the DOT specified containers, and are of the same strength and durability.
(7)	___	___	_X_	The facility was storing liquid PCBs in containers larger than those specified in (C)(6).
				If YES, the facility had:
(i)	___	___	_X_	Designed, constructed and operated the containers in compliance with Occupational Safety and Health Standards, 29 CFR 1910.106, Flammable and combustible liquids. The design of the containers was reviewed to determine the effect upon the structural safety of the containers that would result from placing liquids with the specific gravity of PCBs into the containers.
(ii)	___	___	_X_	Prepared a Spill Prevention Control and Countermeasure Plan for the storage area.

COMMENTS

761.65 STORAGE FOR DISPOSAL

	YES	NO	N.A.	
761.65(c)				Non-permanent storage for disposal facilities:
(1)	___	___	_X_	The facility stored PCB Items in a storage area that does not comply with 761.65(b)(1) for 30 days or less.
(1)	___	___	_X_	All PCB Items in the 30 day storage area were clearly noted with the date they were removed from service.
				The items in the 30 day storage area were limited to:
(i)	___	___	_X_	Non-leaking PCB Articles and Equipment.
(ii)	___	___	_X_	Leaking PCB Articles or Equipment which had been placed in a non-leaking PCB Container with sufficient sorbent to absorb any PCBs remaining in the Article or Equipment.
(iii)	___	___	_X_	PCB Containers containing non-liquid PCBs.
(iv)	___	___	_X_	PCB Containers containing liquid PCBs with <500 ppm. The PCB concentration was noted on the container, and a Spill Prevention Control and Countermeasure Plan was prepared for the 30 day storage area.
(2)	___	___	_X_	The facility stored PCB Items on pallets adjacent to a storage facility that complies with 761.65(b)(1).
(2)	___	___	_X_	The items stored adjacent to the facility were limited to non-leaking PCB Large Capacitors and PCB contaminated electrical equipment.
(2)	___	___	_X_	The adjacent complying storage facility had immediately available storage space equal to 10% of the volume of the capacitors and equipment stored in the adjacent non-complying area.
(2)	___	___	_X_	All capacitors and equipment in the adjacent storage area were checked for leaks weekly.

COMMENTS

SUBPART B Use of PCBs & PCB Items

761.30(a)(1)(xii):

Not all required inspection records since 5/81 were available.

761.30(a)(1)(xii)(C):

The PCB transformer inspection records did not include the name of the person performing the inspection.

SUBPART C Marking of PCBs

761.40(j):

Exterior transformer locations were not marked as specified in 40 CFR 761.45.

SUBPART D Storage and Disposal

761.60(d)(1):

Leaks and spills of PCBs at concentrations of 50 ppm or greater constitute illegal disposal of PCBs.

SUBPART J Records and Reports

761.180(a):

No Annual Documents had not been compiled for PBC Items in service.

1) Notice of Inspection.
2) Notice of Confidentiality.
3) Receipt for Documents.
4) Copies of Manifests (CB 94).
5) Copies of Inspection Reports (CB 95).
6) Invoice reflecting installation of curbs.
7) Photos.

US ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DO 20460

EPA

TOXIC SUBSTANCES CONTROL ACT

NOTICE OF INSPECTION

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. TIME	3. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.		
9/22/87	CA-1001	1	15:30	BECKMAN INSTRUMENTS 2500 N. HARBOR BLVD.

4. INSPECTOR ADDRESS	5. FIRM ADDRESS
107 S. BROADWAY L.A 90012	2500 N. HARBOR BLVD. FULLERTON CA 92634

REASON FOR INSPECTION

Under the authority of Section 11 of the Toxic Substances Control Act :

☒ For the purpose of inspecting (including taking samples, photographs, statements, and other inspection activities) an establishment, facility, or other premises in which chemical substances or mixtures or articles containing same are manufactured, processed or stored, or held before or after their distribution in commerce (including records, files, papers, processes, controls, and facilities) and any conveyance being used to transport chemical substances, mixtures, or articles containing same in connection with their distribution in commerce (including records, files, papers, processes, controls, and facilities) bearing on whether the requirements of the Act applicable to the chemical substances, mixtures, or articles within or associated with such premises or conveyance have been complied with.

☐ In addition, this inspection extends to *(Check appropriate blocks)*:

☐ A. Financial data
☐ B. Sales data
☐ C. Pricing data
☐ D. Personnel data
☐ E. Research data

The nature and extent of inspection of such data specified in A through E above is as follows:

FACILITY REPRESENTATIVE DECLINED TO SIGN FORM BUT DID NOT REFUSE ENTRY TO FACILITY

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Clarence Berman			
NAME		NAME	
CLARENCE BERMAN			
TITLE	DATE SIGNED	TITLE	DATE SIGNED
ASST. HAZ MAT SPECIALIST	9/22/87		

EPA

'S ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

TSCA INSPECTION CONFIDENTIALITY NOTICE

Form Approved
OMB No. 2070-0007
Approval expires 8-31-85

1. INVESTIGATION IDENTIFICATION

DATE	INSPECTOR NO.	DAILY SEQ. NO.
9/22/87	CA-001	1

2. FIRM NAME
BECKMAN INSTRUMENTS

3. INSPECTOR NAME
CLARENCE BERMAN

4. FIRM ADDRESS
2500 N. HARBOR BLVD.
FULLERTON, CA 92634

5. INSPECTOR ADDRESS
107 S. BROADWAY L.A 90012

6. CHIEF EXECUTIVE OFFICER NAME
LOUIS RASSO

7. TITLE
PRESIDENT

TO ASSERT A CONFIDENTIAL BUSINESS INFORMATION CLAIM

It is possible that EPA will receive public requests for release of the information obtained during inspection of the facility above. Such requests will be handled by EPA in accordance with provisions of the Freedom of Information Act (FOIA), 5 USC 552; EPA regulations issued thereunder, 40 CFR Part 2; and the Toxic Substances Control Act (TSCA), Section 14. EPA is required to make inspection data available in response to FOIA requests unless the Administrator of the Agency determines that the data contain information entitled to confidential treatment or may be withheld from release under other exceptions of FOIA.

Any or all the information collected by EPA during the inspection may be claimed confidential if it relates to trade secrets or commercial or financial matters that you consider to be confidential business information. If you assert a CBI claim, EPA will disclose the information only to the extent, and by means of the procedures set forth in the regulations (cited above) governing EPA's treatment of confidential business information. Among other things, the regulations require that EPA notify you in advance of publicly disclosing any information you have claimed as confidential business information.

A confidential business information (CBI) claim may be asserted at any time. You may assert a CBI claim prior to, during, or after the information is collected. The declaration form was developed by the Agency to assist you in asserting a CBI claim. If it is more convenient for you to assert a CBI claim on your own stationery or by marking the individual documents or samples "TSCA confidential business information," it is not necessary for you to use this form. The inspector will be glad to answer any questions you may have regarding the Agency's CBI procedures.

While you may claim any collected information or sample as confidential business information, such claims are unlikely to be upheld if they are challenged unless the information meets the following criteria:

1. Your company has taken measures to protect the confidentiality of the information, and it intends to continue to take such measures.
2. The information is not, and has not been, reasonably obtainable without your company's consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on showing of special need in a judicial or quasi-judicial proceeding).
3. The information is not publicly available elsewhere.
4. Disclosure of the information would cause substantial harm to your company's competitive position.

At the completion of the inspection, you will be given a receipt for all documents, samples, and other materials collected. At that time, you may make claims that some or all of the information is confidential business information.

If you are not authorized by your company to assert a CBI claim, this notice will be sent by certified mail, along with the receipt for documents, samples, and other materials to the Chief Executive Officer of your firm within 2 days of this date. The Chief Executive Officer must return a statement specifying any information which should receive confidential treatment.

The statement from the Chief Executive Officer should be addressed to:

and mailed by registered, return-receipt requested mail within 7 calendar days of receipt of this Notice. Claims may be made any time after the inspection, but inspection data will not be entered into the special security system for TSCA confidential business information until an official confidentiality claim is made. The data will be handled under the agency's routine security system unless and until a claim is made.

FACILITY REPRESENTATIVE DECLINED TO SIGN FORM BUT DID NOT REFUSE ENTRY

TO BE COMPLETED BY FACILITY OFFICIAL RECEIVING THIS NOTICE:

I have received and read the notice

SIGNATURE	
NAME	
TITLE	DATE SIGNED

If there is no one on the premises of the facility who is authorized to make business confidentiality claims for the firm, a copy of this Notice and other inspection materials will be sent to the company's chief executive officer. If there is another company official who should also receive this information, please designate below.

NAME	
TITLE	
ADDRESS	

EPA

U.S. ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

TOXIC SUBSTANCES CONTROL ACT

RECEIPT FOR SAMPLES AND DOCUMENTS

Form Approved
OMB No. 2070-0007
Expires 3-31-88

1. INVESTIGATION IDENTIFICATION			2. FIRM NAME
DATE	INSPECTOR NO.	DAILY SEQ. NO.	BECKMAN INSTRUMENTS
9/22/87	CA-001	01	
3. INSPECTOR ADDRESS			4. FIRM ADDRESS
107 S. BROADWAY, LA 90012			2500 N. HARBOR BLVD FULLERTON, CA

The documents and samples of chemical substances and/or mixtures described below were collected in connection with the administration and enforcement of the Toxic Substances Control Act.

RECEIPT OF THE DOCUMENT(S) AND/OR SAMPLE(S) DESCRIBED IS HEREBY ACKNOWLEDGED:

NO.	DESCRIPTION
CB 94	COPIES OF MANIFESTS
CB 95	COPIES OF INSPECTION REPORTS
	COPY OF INVOICE REFLECTING BERM INSTALLATIONS (SENT BY MAIL).
	DID NOT SIGN.

OPTIONAL:

DUPLICATE OR SPLIT SAMPLES: REQUESTED AND PROVIDED ☐ NOT REQUESTED ☐

INSPECTOR SIGNATURE		RECIPIENT SIGNATURE	
Clarence Berman			
NAME		NAME	
CLARENCE BERMAN			
TITLE	DATE SIGNED	TITLE	DATE SIGNED
ASSOC. HAZ MAT SPEC.	9/22/87		

REGIONAL OFFICE

ATTACHMENT #4

State of California—Health and Welfare Agency
Form Approved OMB No. 2050—0039 (Expires 9-30-88)
Please print or type. (Form designed for use on elite (12-pitch typewriter).

Department of Health Services
Toxic Substances Control Division
Sacramento, California

UNIFORM HAZARDOUS WASTE MANIFEST

Generator's US EPA ID No.	Manifest Document No.	2. Page 1 of 1	Information in the shaded areas is not required by Federal law.
C A D 0 0 8 2 5 4 7 0 8	0 0 0 1		

3. Generator's Name and Mailing Address
Beckman Instruments
2500 N. Harbor Blvd., Fullerton, CA. 92633

4. Generator's Phone (714) 990-4100

A. State Manifest Document Number: 87325005

B. State Generator's ID: C A D 0 0 8 2 5 4 7 0 8

5. Transporter 1 Company Name: American Environmental Mgmt. Co.
6. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

C. State Transporter's ID: 80401

D. Transporter's Phone: 714 826-6320

7. Transporter 2 Company Name
8. US EPA ID Number

E. State Transporter's ID

F. Transporter's Phone

9. Designated Facility Name and Site Address
American Environmental Mgmt. Co.
11855 White Rock Road
Rancho COrdova, CA. 95670
10. US EPA ID Number: C A D 9 8 0 8 8 4 1 8 3

G. State Facility's ID: CAD980884183

H. Facility's Phone: 916 985-6666

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a. "RQ" Waste Hazardous Substance, N.O.S., ORM-E NA 9188 (Containing Polychlorinated Biphenyls	0 0 3	C M	2 9 1 5 0	P	State 261 / EPA/Other RCRA Exempt
b.					State / EPA/Other
c.					State / EPA/Other
d.					State / EPA/Other

J. Additional Descriptions for Materials Listed Above
Item A: Transformer carcusses containing unknown concentrations of PCB oil
Out of Service Date 7/8/87

K. Handling Codes for Wastes Listed Above
a. T4 b.
c. d.

15. Special Handling Instructions and Additional Information
PVC Boots and Gloves, White Tyvek, 1/2 Face Resp. and Saranex Suit on stand by
Job #5981 AEMC Approval #0231

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national government regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimizes the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name	Signature	Month Day Year
LELOND A. PARDE		10 7 1 8 87

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year
TRAIL ESCALERA		10 7 1 1 87

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Month Day Year

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Month Day Year
Kevin Tesio		10 7 2 9 87

IN CASE OF AN EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1-800-424-8802; WITHIN CALIFORNIA CALL 1-800-852-7550

DHS 8022 A (1/87)
EPA 8700—22
(Rev. 9-86) Previous editions are obsolete.

Yellow: TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

INSTRUCTIONS ON THE BACK

State of California—Health and Welfare Agency

Department of Health Services
Toxic Substances Control Division
Sacramento, California

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. CAD000825208 Manifest Document No. 85096 2. Page 1 of 1 Information in the shaded areas is not required by Federal law.

A. State Manifest Document Number 84853663

3. Generator's Name and Mailing Address
Beckman Instruments
2500 Harbor Blvd, Fullerton Ca. 92634
4. Generator's Phone (714) 773-7921

B. State Generator's ID

5. Transporter 1 Company Name
U.S. Services Inc.
6. US EPA ID Number CAT080034259

C. State Transporter's ID

7. Transporter 2 Company Name
8. US EPA ID Number

D. Transporter's Phone

E. State Transporter's ID

9. Designated Facility Name and Site Address
North American Environmental Inc.
217 N. Lagoon Av,
Wilmington Ca.
10. US EPA ID Number CAD982065947

F. Facility's Phone

11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	12. Containers No.	Type	13. Total Quantity	14. Unit Wt/Vol	Waste No.
a. Waste Polychlorinated Biphenyls ORM-E UN2315 "RQ" (6) PCB Transformers Over 500 PPM Emptyed	006	C.M	35200	P.	261
b.					
c.					
d.					

J. Additional Descriptions for Materials Listed Above
A. TRANSFORMERS EMPTIED, FLUSHING OF TRANSFORMERS WERE OCCUR AT TRANSFER FACILITY.

K. Handling Codes for Wastes Listed Above
A-H

15. Special Handling Instructions and Additional Information
HANDLE WITH EXTREME CARE
USE ONLY NIOSHA & OSHA APPROVED SAFETY EQUIPMENT ONLY WHEN HANDLING.
EMERGENCY TELEPHONE CONTACT NO# (714) 898-7300 C.E.H.W.P. NO# E-7018
"RQ" IS 10 LBS/4.54KGS OR GREATER.

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

Printed/Typed Name	Signature	Date (Month Day Year)
LELOND ALBERT PARDE		11 01 23 85

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)
BOYCE ROBERTS		11 01 23 85

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name	Signature	Date (Month Day Year)

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name	Signature	Date (Month Day Year)
James Loomis NAFT		11 01 23 85

GENERATOR

84853663

YELLOW TSDF SENDS THIS COPY TO GENERATOR WITHIN 30 DAYS

DHS 8022 A (11/84)
EPA 8700-22)

84 89641

ATTACHMENT #5

QUARTERLY REPORT
(From Load Reading Records)

Enter (ok) or (Leak) Below

If (leak) give description of Location (bushing, valve, cooling fin, seam, etc.) and complete Page 2A

DATE ____ ____ ____ ____

TC#	BLDG	COL	MFG	SERIAL #	1st	2nd	3rd	4th
5	1	37	G.E.	B975604	✓	RLTHE 4/07 10/23/85		
6	2	26	G.E.	B975273	✓			
13	2	12	G.E.	B975270	✓			
12	2	4	G.E.	B975287	✓			
7/22/85 11	3	H	ITE	9410-62				
7/22/85 10	3	O	G.E.	B975272				
3	4	4	G.E.	C856375	✓			
4	4	4	G.E.	C856374	✓			
7	~~8~~	27	WEST	7372815				
8	5	15	ITE	9473-62				
2	6	V-3	SQ-D	35427				
7/22/85 14	8	M-3	G.E.	B975271				

Signature of person checking transformers

4th

3rd

2nd

1st

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.

3890 HOWRY AVENUE, SUITE A, FREMONT, CA 94538

EC 003

CUST. BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04321000 DATE PRINTED 3/27/8

SUB NAME BLDG. 5 WEST UNIT # OTHER LOCATION OUTDOOR/

NAMEPLATE DATA

MFG.	WEST	EQUIP. TYPE	TRANSFORMER
DATE MFG.		TRANS CLASS	
S/N	7372815	IMPEDENCE	5.40%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	470	GAL LIQUID	455

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	1.00 INCH	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION FAIR LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR		SP. GR.		VISUAL		SEDIMENT	
12/00/76					.010	AC	N/A	45	AC	WTR WHITE	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.020	AC	N/A	45	AC	PALE GREN	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.020	AC	N/A	44	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.015	AC	N/A	33	AC	WTR WHITE	AC	1.550	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	27 C		.005	AC	N/A			WTR WHITE	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.

3690 MOWRY AVENUE, SUITE A, FREMONT, CA 94538

0007

CUST BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04821000 DATE PRINTED 8/11/87
SUB NAME BLDG. 5 WEST UNIT # OTHER LOCATION OUTDOOR/

NAMEPLATE DATA

MFG	WEST	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	OA
S/N	7372815	IMPEDENCE	5.40%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	470	GAL LIQUID	455

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	1.00 IN	OTHER ACCESS	TOP INSPECTION PLATE

VISUAL INSPECTION

PAINT CONDITION FAIR LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID	IFT	DIEL	COLOR	SP. GR.	VISUAL	SEDIMENT
12/00/76					.010 AC	N/A	45 AC	WTR WHITE AC	1.560 AC	CLEAR AC	NONE AC
12/00/77					.020 AC	N/A	45 AC	PALE GREN AC	1.540 AC	CLEAR AC	NONE AC
1/00/79					.020 AC	N/A	44 AC	WTR WHITE AC	1.560 QU	CLEAR AC	NONE AC
1/00/80					.015 AC	N/A	38 AC	WTR WHITE AC	1.550 AC	CLEAR AC	NONE AC
8/10/86		NORMAL	27 C		.005 AC	N/A		WTR WHITE AC	1.540 AC	CLEAR AC	NONE AC
8/26/87		NORMAL	84 C	1.0	.005 AC	N/A	37 AC	WTR WHITE AC	1.540 AC	CLEAR AC	NONE AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

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CUST. BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04321000 DATE PRINTED 3/27/8

SUB. NAME BUILDING 6 UNIT # OTHER LOCATION OUTDOOR/GROUND

NAMEPLATE DATA

MFG.	SQUARE D	EQUIP. TYPE	TRANSFORMER
DATE MFG.		TRANS CLASS	
S/N	35427	IMPEDENCE	5.60%
KVA	750	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	240

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H2O COOLED	NO	BUSHING LOC	
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	1.00 INCH	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION BAD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR		SP. GR.		VISUAL		SEDIMENT	
12/00/76					.015	AC	N/A	38	AC	PALE YELO	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.030	AC	N/A	43	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	44	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.025	AC	N/A	34	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	34 C	0.5	.015	AC	N/A			PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
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3890 MOWRY AVENUE, SUITE A, FREMONT, CA 94538

0002

CUST BECKMAN INSTRUMENTS CITY ULLERTON CA ID # 04321000 DATE PRINTED 3/11/87

SUB NAME BUILDING 6 UNIT # OTHER LOCATION OUTDOOR/GROUND

NAMEPLATE DATA

MFG	SQUARE D	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	OA
S/N	35427	IMPEDENCE	5.60%
KVA	750	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	240

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	1.00 IN	OTHER ACCESS	TOP INSPECTION PLAT

VISUAL INSPECTION

PAINT CONDITION BAD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR	SP. GR.		VISUAL		SEDIMENT	
12/00/76					.015	AC	N/A	38	AC	PALE YELO	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.030	AC	N/A	43	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	44	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.025	AC	N/A	94	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	34 C	0.5	.015	AC	N/A			PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC
2/26/87		NORMAL	66 C	0.5	.010	AC	N/A	94	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

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CUST. BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04321000 DATE PRINTED 3/27/

SUB. NAME BLDG. 3 SOUTH UNIT # 165239 OTHER LOCATION INDOOR /

NAMEPLATE DATA

MFG.	GE	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	
S/N	B975272	IMPEDENCE	4.95%
KVA	300	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	250

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	1.00 INCH	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR	SP. GR.		VISUAL		SEDIMENT	
12/00/76					.020	AC	N/A	42	AC	PALE YELO	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.030	AC	N/A	39	AC	PALE GREN	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	43	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.035	AC	N/A	28	QU	WTR WHITE	AC	1.560	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	43 C		.025	AC	N/A			WTR WHITE	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

A DIVISION OF S.D. MYERS INC.

CUST BECKMAN INSTRUMENTS CI FULLERTON CA ID # 04321000 DATE PRINTED 3/11/87

SUB. NAME BLDG. 3 SOUTH UNIT # 165239 OTHER LOCATION INDOOR /

NAMEPLATE DATA

MFG	GE	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	DA-TI
S/N	8975272	IMPEDENCE	4.95%
KVA	300	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	250

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	1.00 IN	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR		SP. GR		VISUAL		SEDIMENT	
12/00/76					.020	AC	N/A	42	AC	PALE YELO	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.030	AC	N/A	39	AC	PALE GREN	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	43	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.035	AC	N/A	28	QU	WTR WHITE	AC	1.560	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	43 C		.025	AC	N/A			WTR WHITE	AC	1.540	AC	CLEAR	AC	NONE	AC
2/26/87		NORMAL	53 C		.020	AC	N/A	33	AC	PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.
3890 MOWRY AVENUE, SUITE A, FREMONT, CA 94538

CUST. BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04321000 DATE PRINTED 3/27/8
SUB. NAME BLDG. 5 CENTER UNIT # N-75300-B OTHER LOCATION OUTDOOR/GROUND

NAMEPLATE DATA

MFG.	ITE	EQUIP. TYPE	TRANSFORMER
DATE MFG.		TRANS CLASS	
S/N	9473-62	IMPEDENCE	6.01%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	420

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	2.00 INCH	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR		SP. GR.		VISUAL		SEDIMENT	
12/00/76					.015	AC	N/A	45	AC	PALE YELO	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.015	AC	N/A	42	AC	PALE GREN	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.025	AC	N/A	44	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.015	AC	N/A	33	AC	WTR WHITE	AC	1.560	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	29 C	0.5-	.010	AC	N/A			WTR WHITE	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.

3890 MOWRY AVENUE, SUITE A, FREMONT, CA 94538

0008

CUST BECKMAN INSTRUMENTS | CITY FULLERTON CA | ID # 04321000 | DATE PRINTED 3/11/87
SUB NAME BLDG. 5 CENTER | UNIT # N-75300-B | OTHER | LOCATION OUTDOOR/GROUND

NAMEPLATE DATA

MFG	ITE	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	DA
S/N	9473-62	IMPEDENCE	6.01%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	420

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H2O COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	500 FEET
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	2.00 IN	OTHER ACCESS	TOP INSPECTION PLAT

VISUAL INSPECTION

PAINT CONDITION FAIR LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID	IFT	DIEL	COLOR	SP. GR.	VISUAL	SEDIMENT
12/00/76					.015 AC	N/A	45 AC	PALE YELO AC	1.560 AC	CLEAR AC	NONE AC
12/00/77					.015 AC	N/A	42 AC	PALE GREN AC	1.540 AC	CLEAR AC	NONE AC
1/00/79					.025 AC	N/A	44 AC	WTR WHITE AC	1.360 QU	CLEAR AC	NONE AC
1/00/80					.015 AC	N/A	33 AC	WTR WHITE AC	1.560 AC	CLEAR AC	NONE AC
3/10/86		NORMAL	29 C	0.5-	.010 AC	N/A		WTR WHITE AC	1.540 AC	CLEAR AC	NONE AC
2/26/87		NORMAL	75 C	0.5-	.020 AC	N/A	36 AC	PALE YELO AC	1.540 AC	CLEAR AC	NONE AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.
3890 MOWRY AVENUE, SUITE A, FREMONT, CA 94538

EC 002

CUST. BECKMAN INSTRUMENTS | CITY FULLERTON CA | ID # 04321000 | DATE PRINTED 3/27/8
SUB. NAME BLDG. 3 CENTER | UNIT # N-75300-A | OTHER | LOCATION INDOOR /GROUND

NAMEPLATE DATA

MFG	ITE	EQUIP. TYPE	TRANSFORMER
DATE MFG.		TRANS CLASS	
S/N	9410-62	IMPEDENCE	5.87%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	420

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	2.00 INCH	OTHER ACCESS	

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR		SP. GR.		VISUAL		SEDIMENT	
12/00/76					.020	AC	N/A	50	AC	WTR WHITE	AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.025	AC	N/A	44	AC	PALE GREN	AC	1.540	AC	CLEAR	AC	NONE	AC
1/00/79					.025	AC	N/A	42	AC	WTR WHITE	AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.030	AC	N/A	27	QU	PALE YELO	AC	1.550	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	41 C	0.5-	.015	AC	N/A			PALE YELO	AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

A DIVISION OF S.D. MYERS INC.

CUST BECKMAN INSTRUMENTS | CI FULLERTON CA | ID # 04921000 | DATE PRINTED 9/11/87

SUB NAME BLDG. 8 CENTER | UNIT # N-75800-A | OTHER | LOCATION INDOOR /GROUND

NAMEPLATE DATA

MFG	ITE	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	OA
S/N	9410-62	IMPEDENCE	5.07%
KVA	1,000	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	420

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H2O COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	2.00 IN	OTHER ACCESS	TOP INSPECTION PLAT

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS NONE

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR	SP GR		VISUAL		SEDIMENT	
12/00/76					.020	AC	N/A	50	AC	WTR WHITE AC	1.360	AC	CLEAR	AC	NONE	AC
12/00/77					.025	AC	N/A	44	AC	PALE GREN AC	1.340	AC	CLEAR	AC	NONE	AC
1/00/79					.025	AC	N/A	42	AC	WTR WHITE AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.030	AC	N/A	27	QU	PALE YELO AC	1.330	AC	CLEAR	AC	NONE	AC
8/10/86		NORMAL	41 C	0.5-	.015	AC	N/A			PALE YELO AC	1.340	AC	CLEAR	AC	NONE	AC
8/26/87		NORMAL	42 C	0.5-	.020	AC	N/A	31	AC	PALE YELO AC	1.340	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

TRANSFORMER CONSULTANTS
A DIVISION OF S.D. MYERS INC.

3890 HOWRY AVENUE, SUITE A, FREMONT, CA 94538

CUST. BECKMAN INSTRUMENTS CITY FULLERTON CA ID # 04321000 DATE PRINTED 3/27/8
SUB. NAME BLDG. B UNIT # OTHER LOCATION INDOOR /

NAMEPLATE DATA

MFG.	GE	EQUIP. TYPE	TRANSFORMER
DATE MFG.		TRANS CLASS	
S/N	B975271	IMPEDENCE	4.95%
KVA	300	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	250

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	
TOP FPV	1.00 INCH	POWER V/A	
BOTTOM FPV	1.00 INCH	OTHER ACCESS	TOP INSPECTION PLAT

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS YES/BOTTON FPV (CLEANED-UP)
TRACE OF OIL
REMOVED FROM SERVICE
7/18/87
FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR	SP. GR.		VISUAL		SEDIMENT	
12/00/76					.010	AC	N/A	40	AC	WTR WHITE AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.020	AC	N/A	43	AC	PALE GREN AC	1.550	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	43	AC	WTR WHITE AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.045	AC	N/A	36	AC	PALE YELO AC	1.560	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	40 C		.015	AC	N/A			WTR WHITE AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

A DIVISION OF S.D. MYERS INC.

CUST. BECKMAN INSTRUMENTS C FULLERTON CA ID # 04321000 DATE PRINTED 3/11/87

SUB. NAME BLDG. 8 UNIT # OTHER LOCATION INDOOR /GROUND

NAMEPLATE DATA

MFG.	GE	EQUIP. TYPE	TRANSFORMER
DATE MFG		TRANS CLASS	OA-TI
S/N	B975271	IMPEDENCE	4.95%
KVA	300	PHASE/CYCLE	3/60
PRI	12,000	LIQUID TYPE	ASKAREL
SEC	480	GAL LIQUID	250

ADDITIONAL EQUIPMENT

RADIATORS	YES	CONSERVATOR	NO
FANS	NO	TAP CHANGER	NO
H20 COOLED	NO	BUSHING LOC	SIDE ENCLOSED
OIL PUMPS	NO	RECLAIMER	250 FEET
TOP FPV	1.00 IN	POWER V/A	
BOTTOM FPV	1.00 IN	OTHER ACCESS	TOP INSPECTION PLA

VISUAL INSPECTION

PAINT CONDITION GOOD LEAKS YES/BFPV CLEANED UP TRACE AMOUNT REMOVED FROM SERVICE 7/18/87

FIELD SERVICE

PCB CONTENT / EXPRESSED IN PPM

DATE OF SERVICE	1242 AROCLOR	1254 AROCLOR	1260 AROCLOR	OTHER	TOTAL CONTENT

COLOR LABEL CLASS

LIQUID SCREEN TEST DATA

DATE	SERVICE	LEVEL	TEMP	P/V	ACID		IFT	DIEL		COLOR	SP. GR.		VISUAL		SEDIMENT	
12/00/76					.010	AC	N/A	40	AC	WTR WHITE AC	1.560	AC	CLEAR	AC	NONE	AC
12/00/77					.020	AC	N/A	43	AC	PALE GREN AC	1.550	AC	CLEAR	AC	NONE	AC
1/00/79					.030	AC	N/A	43	AC	WTR WHITE AC	1.360	QU	CLEAR	AC	NONE	AC
1/00/80					.045	AC	N/A	36	AC	PALE YELD AC	1.560	AC	CLEAR	AC	NONE	AC
3/10/86		NORMAL	40 C		.015	AC	N/A			WTR WHITE AC	1.540	AC	CLEAR	AC	NONE	AC
2/26/87		NORMAL	46 C		.015	AC	N/A	37	AC	WTR WHITE AC	1.540	AC	CLEAR	AC	NONE	AC

COMMENTS TRANSFORMER LIQUID TEST DATA ACCEPTABLE IN ALL CATEGORIES.

GAS-IN-OIL ANALYSIS / GAS CHROMATOGRAPHY EXPRESSED IN PPM

DATE	SERVICE	HYDROGEN	OXYGEN	NITROGEN	METHANE	CARBON MONOXIDE	CARBON DIOXIDE	ETHANE	ETHYLENE	ACETYLENE	TOTAL COMBUSTIBLE	TOTAL GAS

KEY TO ABBREVIATIONS: AC — ACCEPTABLE QU — QUESTIONABLE UN — UNACCEPTABLE

LOCATION OF TRANSFORMER

BLDG [8] COL. [M]

UNIT OR TAG# _____

MANUFACTURER GE KVA 300

SERIAL# B975271 GAL. 250 OIL ☐ ASKAREL ☒

DATE	TIME	AMP. READING 1φ ① 400A		② 225		③ 200		CHECK FOR & IDENTIFY LEAKS
6/20/83	1300	140	A	27		0		YES ☐ NO ☒
VOLTS	TEMP	125	B	22		—		
475	42	160	C	22		0		
DATE	TIME	①		②		③ 1φ		YES ☐ NO ☒
7/2/84	1515	110	A	40		0		
VOLTS	TEMP	120	B	36		—		
480	42	150	C	38		0		
DATE	TIME	①		②		③		YES ☐ NO ☒
5/14/84	1300	140	A	42		0		
VOLTS	TEMP	140	B	40		—		
492	45	170	C	42		0		
DATE	TIME	① 400		② 225		③ 240		YES ☐ NO ☒
8-12-86	10:23	70	A	26				
VOLTS	TEMP	65	B	28				
483	45	80	C					

TAP SETTING ☐ DATE _____ ☐ DATE _____

NOTIFY PLANT ENGINEERING IMMEDIATELY IF ANY LEAKS FOUND.

LOCATION OF TRANSFORMER
BLDG [3] COL. [N]
UNIT OR TAG # 165299

MANUFACTURER GE KVA 300
SERIAL # B975272 GAL. 250 OIL ☐ ASKAREL ☒

DATE	TIME	AMP. READING ① 225A	② 100	③ 70	④ 125	⑤ 100	○	○	CHECK FOR & IDENTIFY LEAKS
6/20/83	1000	100 A	25	15	38			178	YES ☐ NO ☒
VOLTS	TEMP	125 B	34	15	40			214	
484	44	100 C	27	10	40			177	
DATE	TAPS TIME	CHANGED 12/27/83 ①	②	③	④	⑤	○	○	YES ☐ NO ☐
2/2/84	1315	90 A	22	12	40	7			
VOLTS	TEMP	100 B	35	12	40	7			
475	45	95 C	25	10	38	8			
DATE	TIME	①	②	③	④	⑤	○	○	YES ☐ NO ☐
5/14/84	1030	100 A	29	15	40	9			
VOLTS	TEMP	100 B	39	16	36	9			
471	42	100 C	26	13	32	10			
DATE	TIME	① 225	② 100	③ 70	④ 120 Dum. 7	⑤ 100	○	○	YES ☐ NO ☐
8/28/86	11:52	68 A	30	9	36	Dum. Legs 11			
VOLTS	TEMP	66 B	40	5	33	11			
480	45°	64 C	30	8	38	16			

TAP SETTING ☐ DATE _____ ☐ DATE _____

NOTIFY PLANT ENGINEERING IMMEDIATELY IF ANY LEAKS FOUND.

QUARTERLY REPORT
(From Load Reading Records)

Enter (ok) or (Leak) Below

DATE ____ 8/10/82 11/5/82 3/11/83

If (leak) give description of Location (bushing, valve, cooling fin, seam, etc.) and complete Page 2

TC#	BLDG	COL	MFG	SERIAL #	1st	2nd	3rd	4th	
5	1	37	G.E.	B975604		OK	OK	OK	
6	2	26	G.E.	B975273		"	"	"	
13	2	12	G.E.	B975270		"	"	"	
12	2	4	G.E.	B975287		"	"	"	
11	3	H	ITE	9410-62		"	"	"	
10	3	O	G.E.	B975272		"	"	"	
3	4	4	G.E.	C856375		"	"	"	
4	4	4	G.E.	C856374		"	"	"	
7	5	27	WEST	7372815		"	"	"	
8	5	15	ITE	9473-62		"	"	"	
2	6	V-3	SQ-D	35427		"	"	"	
14	8	M-3	G.E.	B975271		"	"	"	

4th

3rd

2nd

1st

Signature of person checking transformers

TC# BLDG# COL# MFG. SERIAL#

LOCATION OF LEAK

ESTIMATED AMOUNT OF LEAK

CAUSE OF LEAK

ACTION TAKEN

CLEAN-UP COMPANY

LOCATION OF STORAGE

DISPOSAL HAULER

DISPOSAL SITE

Signature

Date Leak Found

Date of 1st clean-up, repair or containment

Daily inspection of containment

Date of final repair, replacement or removal

Dates of follow up inspections

Date placed in storage

Date transported

Date disposed of

Total WT. in Kilograms
LIQUID

ARTICLE

TOTAL

ATTACHMENT #6

Invoice

7386

Prize Corporation
7564 Casino Tampico
Anaheim, Ca. 92807

SOLD TO
Beckman Instruments
2500 Harbor Blvd.
Fullerton, Ca. 92634

SHIP TO
Same

CUSTOMER'S ORDER	SALESMAN	TERMS	SHIPPED VIA	F.O.B.	DATE
#128144	Randy	Completion		Job Site	5/17/83

Install containment curb around oil (surplus) tanks.		$1,331.00
Install containment curbs, two outside Transformer locations.		$1,300.00
TOTAL		$2,631.00

5/2-1 1452-9853-9853-200
O.K. Paul Kenyon
5/19/83
for Tool P.O.

of emp

REORDER 75725
POLY PAK (50 SETS) 7P725

READ CAREFULLY BEFORE SIGNING

(Signature)

PRIZE CORPORATION

Jim Prize
Name of Releasor
(Typed or Printed)

Please Return to:
2540 Harbor Blvd.
Fullerton, Calif. 92634
Mail Stop E-23-B

ATTACHMENT #7

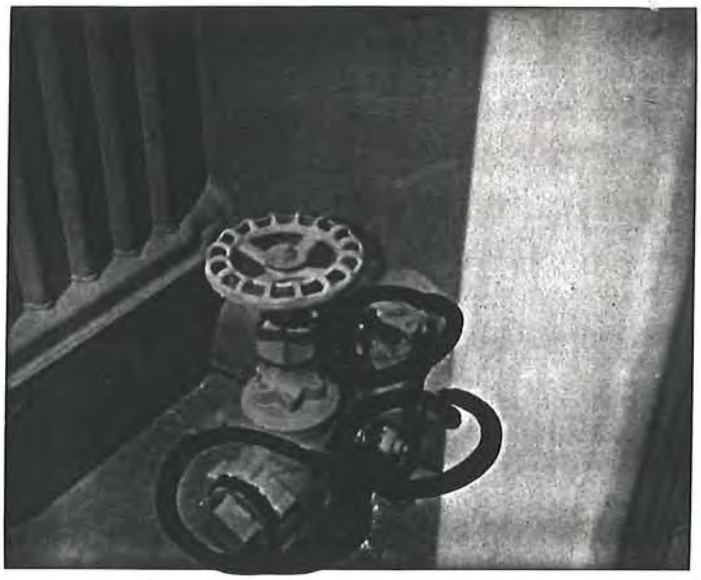


PHOTO #: 1 DATE: 9/22/87

DESCRIPTION: LEAK FROM TRANSFORMER 9473-62

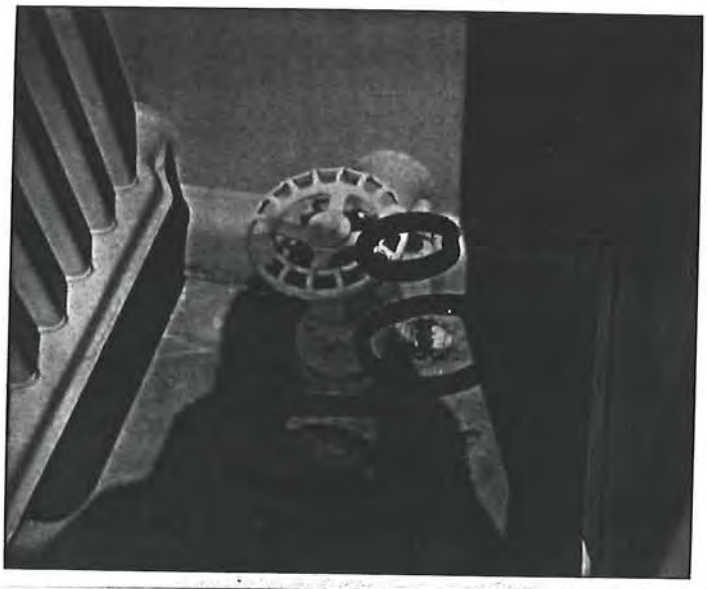


PHOTO #: 2 DATE: 9/22/87

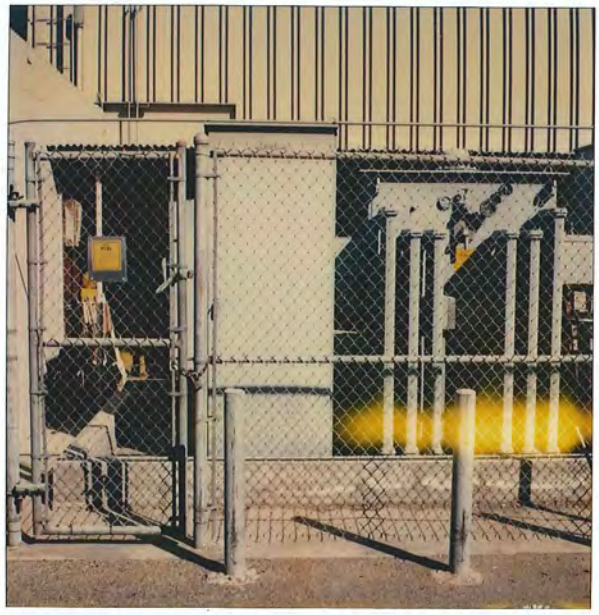
DESCRIPTION: SAME AS ABOVE; DIFFERENT ANGLE

SERIAL
NO. 35427

SERIAL
NO. 35427

SERIAL
NO. 35427

SERIAL
NO. 35427



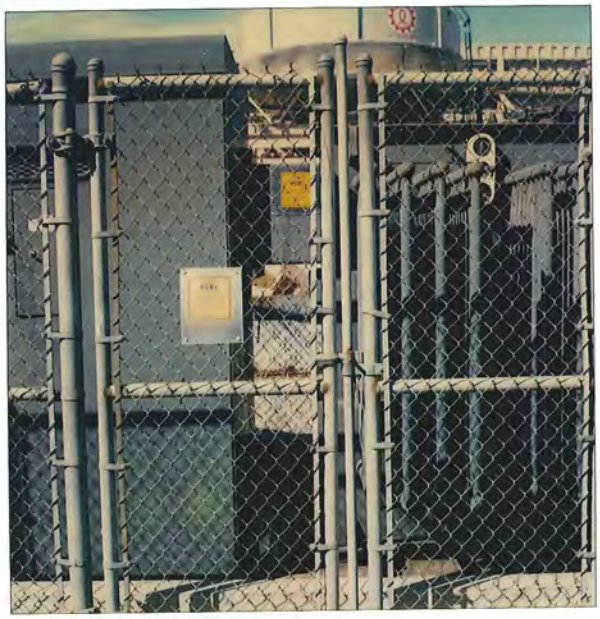
SERIAL
NO. 9473-62

SERIAL
NO. 9473-62

SERIAL
NO. 9473-62

SERIAL
NO. 9473-62

SERIAL
NO. 7372815

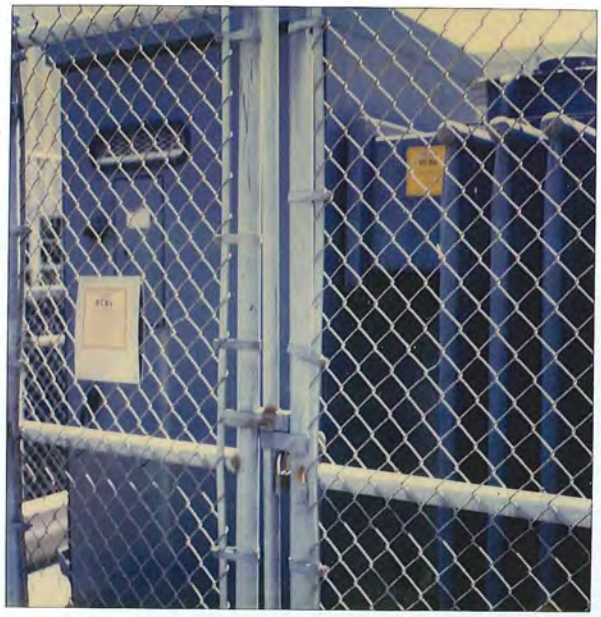


SERIAL
NO. 7372815

SER. # 35427

SER. # 9473-62

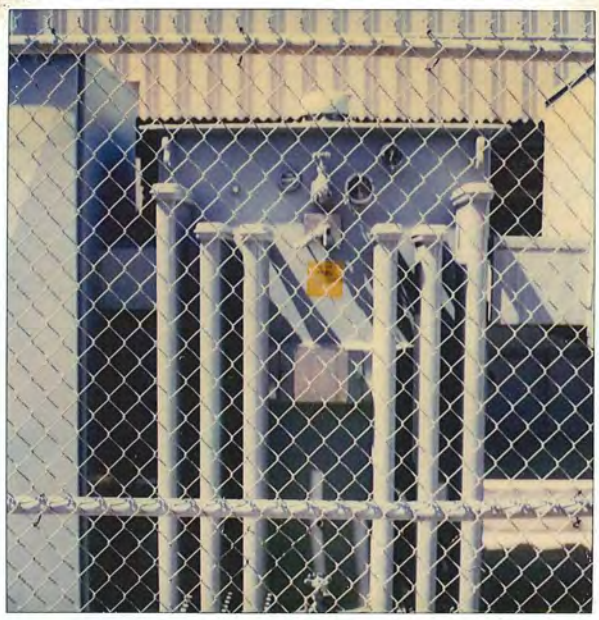
947362



SER. # 7372815

7372815

947362



947362

SER. # 7372815

7372815

APPENDIX B

POLYCHLORINATED BIPHENYL INTERIM MEASURE FINDINGS

BECKMAN COULTER INC.
4300 NORTH HARBOR BOULEVARD
FULLERTON, CALIFORNIA

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

POLYCHLORINATED BIPHENYL
INTERIM MEASURE FINDINGS

BECKMAN COULTER, INC. FACILITY
4300 NORTH HARBOR BOULEVARD
FULLERTON, CALIFORNIA

TABLE OF CONTENTS

TABLES

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FIGURES

Figure

ATTACHMENTS

Attachment

ACRONYMS AND ABBREVIATIONS

AOC	area of concern
BCI	Beckman Coulter, Inc.
bls	below land surface
CAM	California Administrative Manual
CHHSL	California Human Health Screening Level
CMS	Corrective Measures Study
COCs	compounds of concert
CSM	Conceptual Site Model
EDT	Evaporative Desorption Treatment
DTSC	Department of Toxic Substances Control
E2	E2 Environmental
EPA	United States Environnemental Protection Agency
H+A	Hargis + Associates, Inc.
HHRA	human health risk assessment
IRM	Interim Remedial Measure
mg/kg	milligrams per kilogram
mm	millimeter
OSHA	Occupational Safety and Health Administration
PCBs	polychlorinated biphenyls
PID	Photoionization detector
ppmv	parts per million by volume
RCRA	Resource Conservation and Recovery Act

ACRONYMS AND ABBREVIATIONS (continued)

RFI	RCRA Facility Investigation
RSL	regional screening level
SAP	sampling and analysis program
SCAQMD	South Coast Air Quality Monitoring District
SWPPP	Storm Water Pollution Prevention Plan
TSCA	Toxic Substances Control Act
the Site	BCI, 4300 North Harbor Boulevard, Fullerton, California
VOCs	volatile organic compounds

POLYCHLORINATED BIPHENYL INTERIM MEASURE FINIDINGS

BECKMAN COULTER, INC.
4300 NORTH HARBOR BOULEVARD,
FULLERTON, CALIFORNIA

1.0 INTRODUCTION

This summary report was prepared on behalf of Beckman Coulter Inc. (BCI) to document the results of the initial polychlorinated biphenyl (PCB) Interim Measure (IM) Work Plan (Hargis + Associates, Inc. [H+A], 2013b). The PCB IM Work Plan was prepared for review and approval by the Department of Toxic Substances Control (DTSC) and submitted to DTSC on November 8, 2013, pursuant to the soil recommendations of the Draft Corrective Measures Study (CMS), submitted to DTSC on August 29, 2013 (H+A, 2013a). The draft CMS stated that the preferred alternative for PCB-impacted soil is excavation and off-Site disposal at an appropriate, permitted facility. PCB-impacted soils were addressed as an IM in this work plan due to the shallow location and limited expected volume encountered at the time.

2.0 SCOPE OF WORK

The purpose of the PCB IM Work Plan was to remove all known PCB-impacted soil from the site. Data from Site investigations had defined the horizontal and vertical extent of PCB-impacted soil at the Site based on the cleanup level of 0.22 mg/kg (Figure B-1). The data collected to that point indicated the following:

1. PCBs are present at concentrations exceeding the cleanup level in eight sporadic locations in the area east of Building 6 and at one location in Building 10;
2. PCBs are present above the residential (regional screening level) RSL of 0.22 mg/kg but below the PCB threshold limit concentration of 50 mg/kg at 7 locations at shallow depths of 0.5 to 5 feet bgs;
3. PCBs are present above the PCB threshold limit concentration of 50 mg/kg at one location at one foot bgs east of Building 6, and
4. PCBs are present in isolated samples and are present primarily in the upper one-half to two feet of subsurface soil or fill. PCBs had not been detected in one hundred forty two of the one hundred sixty two soil samples collected at the Site that were analyzed for PCBs.

2.1 DELINEATION SAMPLING

Prior to initiation of excavation activities, in-situ delineation samples were collected around the perimeter of the expected excavation borders surrounding each exceedance point. Four perimeter verification samples were collected at the approximate depth of the exceedance point to verify that the horizontal extent of PCB-impacted soil had been defined. The perimeter delineation samples were collected from equally spaced points, separated by approximately 90 degrees around the circumference of the proposed excavation (Figure B-1). For each exceedance point excavation, one delineation sample was collected from the approximate center point of the proposed excavation floor and approximately 1 foot deeper than the exceedance point to verify that the vertical extent of PCB-impacted soil had been defined.

2.2 SOIL REMOVAL AND DISPOSAL

Soil was removed in the vicinity of exceedance points, which were sample locations where PCBs were determined to be present at concentrations greater than 0.22 mg/kg. Based on the results of Site investigations, there were seven exceedance points east of Building 6 and one exceedance point within the footprint of Building 10 (Figure B-1). The initial excavation encompassed a 6 foot by 6 foot area centered on the exceedance point and proceeded to a depth of at least 1 foot greater than the depth of the exceedance point (Table B-1). If a perimeter delineation sample indicated PCB-impacted soil, that area of the excavation was expended by approximately 6 feet. If a central delineation sample indicated PCB-impacted soil, the bottom of the excavation was extended by approximately 1 foot (Figure B-2).

The boundaries of the excavation were staked, and the impacted soil was removed using a backhoe. Removed soil and excavation side walls were visually inspected. Soil removed from within the limits of the designated PCB-impacted soil areas was placed in lined, covered roll-off bins. Soil removed from the vicinity of exceedance point 32-B008 (where PCBs were detected above the TSCA threshold limit concentration of 50 mg/kg) were segregated and placed in a separate roll-off bin.

The excavated soil was temporarily stored in roll-off bins during confirmation and waste characterization sampling. One composite sample was collected per roll-off bin, approximately every 12 tons of soil. Each composite sample consisted of three sub-samples. The sub-samples were thoroughly mixed with a stainless steel trowel prior to collection of the composite samples.

Composite samples were analyzed for PCBs using EPA Method 8082B and total petroleum hydrocarbons (TPH) using EPA Method 8015B. One composite sample collected was also analyzed for California Administrative Manual (CAM) 17 metals using EPA Method 6010B per request of the disposal facility.

2.3 CONFIRMATION SAMPLING

Confirmation samples were collected once the initial excavation process had concluded to verify that PCB-impacted soil exceeding the cleanup level had been removed. Confirmation samples were collected at an approximate frequency of one sample per 10 linear feet for excavation sidewalls and on 10-foot centers (100 square feet) for the excavation floor. Confirmation samples were biased towards areas exhibiting staining, or other evidence of contamination. Samples were collected at multiple depth intervals for excavations exceeding 2 feet bgs.

3.0 SUMMARY OF RESULTS

The PCB IM Work Plan was carried out between November 13 and December 5, 2013. All roll-off bins were removed from the Site by April 4, 2014. The PCB IM Work Plan included delineation sampling, soil excavation, waste characterization and disposal, and confirmation sampling.

3.1 DELINEATION SAMPLING

As outlined above, delineation sampling was completed prior to soil excavation to confirm the excavation boundaries. Delineation samples were collected using direct push technologies following the standard operating procedures outlined in the SAP (H+A, 2010) and collected at depths specified by the exceedance point (Table B-1). The locations of the delineation samples are shown in Figure B-1.

Thirty nine original samples were collected and analyzed for PCBs as part of the delineation process. Aroclors 1016, 1221, 1235, and 1242 were not detected at concentrations greater than detection limits (Table B-2). Thirty of the 39 original samples collected had a detection of one or more PCB Aroclor at concentrations greater than detection limits. Total PCB concentrations ranged from 0.105 mg/kg to 33.5 mg/kg. Twenty five samples had total PBCs greater than 0.22 mg/kg.

Results of the delineation sampling indicated that all excavation except for the one centered on BL10-B034 needed to be expanded in at least one direction and/or deepened (Figure B-1, Table B-2).

3.2 SOIL REMOVAL AND DISPOSAL

PCB-impacted soil was excavated from around all identified exceedance points and placed in lined roll-off bins to be characterized for disposal. Based on the results of delineation sampling (Table B-2), excavation boundaries of five of the six areas were expanded (Figure B-2 and Figures 5 – 9, main report) from the original six foot by six foot areas. In two circumstances (32-B006/32-B008 and SC-03/31-B017), overlapping areas, due to expanded excavation boundaries, were consolidated into one larger excavation. Soil removed from the area near 32-B008 was placed in a separate roll-off bin (Bin 14). Approximately 130 tons of soil was removed and placed in roll-off bins during excavation activities.

Composite soil samples were collected from all roll-off bins for waste disposal characterization. One composite sample was collected per roll-off bin, approximately every 12 tons of soil. Each composite sample consisted of three sub-samples. The sub-samples were thoroughly mixed with a stainless steel trowel prior to collection of the composite samples.

Composite samples were analyzed for PCBs using EPA Method 8082. The first composite sample collected was also analyzed for California Administrative Manual (CAM) 17 metals using EPA Method 6010B. Results of the composite sampling (Table B-3) indicated that Bin 14 contained PCB-impacted soil at concentrations greater than the TSCA limit of 50 mg/kg with a total PCB concentration of 55 mg/kg. All other roll-off bins contained PCB-impacted soil at concentrations of total PCBs less than 15 mg/kg (Table B-3).

All contained soil was transported to the U.S. Ecology disposal facility in Beatty Nevada. All transportation activities were conducted in accordance with Department of Transportation Hazardous Materials Regulations in 49 CFR parts 171 through 180. Manifests for each of the removed roll-off bins, including the U.S. Ecology tickets, are included as Attachment B-1.

3.3 CONFIRMATION SAMPLING

Confirmation sampling was completed on all excavation sidewalls and floors (Table B-2 and Figures 5 – 9, main text) on an approximate 10 foot grid. If the excavations were deeper than approximately 3.5 feet, multiple, vertical side wall samples were collected (Figures 5 – 9, main text). All soil samples were analyzed for PCBs by EPA method 8082 (Table B-2). In addition, selected soil samples were analyzed for VOCs (EPA method 8260B) and TPH (EPA method 8015B) to support the VOC remediation process. Samples were collected in accordance with the operating procedures established in the SAP (H+A, 2010).

Eighty one original samples were collected and analyzed for PCBs as part of the confirmation process. Aroclors 1016, 1221, and 1235were not detected at concentrations greater than detection limits (Table B-2). Seventy one of the 81 original samples collected had a detection of one or more PCB Aroclor at concentrations greater than detection limits. Total PCB concentrations ranged from 0.105 mg/kg to 119 mg/kg. Sixty two samples had total PBCs greater than 0.22 mg/kg. One sample, 32-B024-2.0 (and its duplicate PL502-112513) had concentrations of total PCBs greater than 50 mg/kg. This sample was collected from the southern wall of the 32-B006/32-B008 excavation (Figure 7, main text).

Results of confirmation sampling indicated that the extent of PCB-impacted soil was much greater than initially thought as most of these excavations would have to be widened and possibly even made deeper. It was also recognized that the soil type that all of the PCB detections were coming from was different than the rest of the soil at the Site. PCB-impacted soil tended to be a moist silty clay / clayey silt that was very dark grey-green-brown in color with a sweet chemical odor. The results of the confirmation sampling, coupled with the sampling being conducted as part of the Site demolition process suggested that the PCB-impacted soil was more wide spread than the original localized areas.

4.0 SUMMARY

A total of 120 original soil samples were collected and approximately 130 tons soil was excavated and disposed of during the initial PCB IM work plan. Total PCB concentrations ranged from 0.055 mg/kg to 119 mg/kg in original samples. Aroclors 1016, 1221, and 1232 were not detected at concentrations greater than detection limits.

Confirmation sampling revealed that the extent of PCB-impacted soil at the Site was more widespread than originally thought. Instead of continuing to excavate soil per the original IM work plan, it was decided to take a more aggressive investigatory approach and utilize the heavy equipment already on Site to conduct the trenching investigation described in main text (sections 2.2.8 and 2.5.8) in an effort to delineate the aerial and vertical extent PCB-impacted soil. As described in the main text, the trenching investigation, coupled with all of the supporting documentation and sampling, including the initial PCB IM sampling, indicate that the PCB-impacted soil resides in a layer of soil anywhere between 0.5 and 8 feet thick beneath Building 6 and to the east of Building 6. The PCB IRM Work Plan Addendum describes the scope of work for fully removing and confirming that all PCB-impacted soil at the Site is removed and disposed of properly.

5.0 REFERENCES

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APPENDIX B

TABLES

HARGIS + ASSOCIATES, INC.

TABLE B-1

PCB CONCENTRATIONS AT EXCEEDANCE POINTS (mg/kg)

	RSL_{RES}	mg/kg	0.22	0.22	0.22	0.22
	RSL_{IND}	mg/kg	0.74	0.74	0.74	0.74
AOC - Location	**Sample Name**	**Sample Depth (ft bgs)**	**Aroclor 1242**	**Aroclor 1248**	**Aroclor 1254**	**Aroclor 1260**
31 - East of Bldg 6	31-B017-0.5	0.5	<0.05	0.27	0.46	<0.05
32 - East of Bldg 6	32-B012-05	5	<0.25	0.68	1.5	0.17
32 - East of Bldg 6	AOC32-B01-001	1	7.7	<1	0.32	0.19
32 - East of Bldg 6	AOC32-B06-002	2	<0.05	0.28	0.23	<0.05
32 - East of Bldg 6	AOC32-B08-001	1	<5	34	63	<5
37 - Building 10	BLD10-B024-0.5	0.5	<0.25	<0.25	0.79	<0.25
29 - East of Bldg 6	SC-02	1	0.15	<0.05	0.62	0.31
31 - East of Bldg 6	SC-03	1	2.1	<0.5	0.55	0.24

FOOTNOTES

< = compound not detected above detection limit

bold = compound detected above detection limit

ft bgs = feet below ground surface

Indicates concentration is greater than its respective residential RSL

Indicates concentration is greater than its respective industrial (and residential) RSL

RSL_{RES} = EPA Regional Screening Level

mg/kg = milligrams per kilogram

HARGIS + ASSOCIATES, INC.

TABLE B-2
PCB CONCENTRATIONS IN SOIL - INITIAL IM WORK PLAN

Location ID	Field Sample ID	Sampling Program	Sample Type	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
29-B009	29-B009-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.74J**	**1.1J**	**0.57J**	**2.41**
29-B009	29-B009-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.25	<0.25	<0.25	**1.5**	<0.25	**1.5**	**0.81**	**3.81**
29-B010	29-B010-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.5	<0.5	<0.5	<0.5	**2.5J**	**2J**	**0.89J**	**5.39**
29-B010	29-B010-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.5	<0.5	<0.5	<0.5	**1.7J**	**2.2J**	**1.2J**	**5.1**
29-B011	29-B011-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.43J**	**0.24J**	**0.67**
29-B011	29-B011-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.25	<0.25	<0.25	**0.61J**	<0.25	**0.54J**	**0.15J**	**1.3**
29-B012	29-B012-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.51	<0.51	<0.51	<0.51	<0.51	**1.5J**	**0.69J**	**2.19**
29-B012	29-B012-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.98	<0.98	<0.98	**3.9J**	<0.98	**2.8J**	**1.4J**	**8.1**
29-B013	29-B013-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.98	<0.98	<0.98	<0.98	**4.8J**	**4.2J**	**2.1J**	**11.1**
29-B013	29-B013-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<1	<1	<1	**3.8J**	<1	**4.4J**	**2.4J**	**10.6**
29-B013	PL-506-11272013	PCB IRM Confirmation Sampling	DUP	11/27/2013	2.0	<1	<1	<1	**4.9J**	<1	**6.1J**	**3.5J**	**14.5**
29-B014	29-B014-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.15	<0.15	<0.15	<0.15	**0.5J**	**0.71J**	**0.37J**	**1.58**
29-B014	29-B014-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.5	<0.5	<0.5	**2.2**	<0.5	**2.3**	**1.4**	**5.9**
29-B015	29-B015-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.25	<0.25	<0.25	**1J**	<0.25	**1.2J**	**0.7J**	**2.9**
29-B015	29-B015-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.98	<0.98	<0.98	**2.8J**	<0.98	**3.9J**	**2.2J**	**8.9**
29-B016	29-B016-1.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	1.0	<0.25	<0.25	<0.25	**1.2J**	<0.25	**1.6J**	**0.97J**	**3.77**
29-B016	29-B016-2.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	2.0	<0.25	<0.25	<0.25	**1.9J**	<0.25	**1.8J**	**0.99J**	**4.69**
29-B017	29-B017-3.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	3.0	<0.25	<0.25	<0.25	**1.1J**	<0.25	**1.7J**	**0.95J**	**3.75**
29-B018	29-B018-3.0	PCB IRM Confirmation Sampling	ORG	11/27/2013	3.0	<0.049	<0.049	<0.049	**0.21J**	<0.049	**0.34J**	**0.25J**	**0.8**
31-B019	31-B019-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.05	<0.05	<0.05	**0.3J**	<0.05UJ	<0.05UJ	<0.05UJ	**0.3**
31-B019	PL-504-112613	PCB IRM Confirmation Sampling	DUP	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05UJ	**0.29J**	**0.55J**	**0.25J**	**1.09**
31-B020	31-B020-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.17J**	**0.25J**	**0.12J**	**0.54**
31-B021	31-B021-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<5	<5	<5	**21**	<5	**1.7**	**0.97**	**23.67**
31-B022	31-B022-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.3J**	**1.9J**	**1J**	**4.2**
31-B023	31-B023-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.1J**	**1.9J**	**1.1J**	**4.1**
31-B024	31-B024-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.9J**	**1.3J**	**0.73J**	**2.93**
31-B025	31-B025-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.45J**	**0.56J**	**0.26J**	**1.27**
31-B026	31-B026-1.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.0	<0.49	<0.49	<0.49	<0.49	**1.8J**	**1.5J**	**1J**	**4.3**
31-B027	31-B027-2.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.0	<0.049	<0.049	<0.049	**0.44J**	<0.049	**0.31J**	**0.16J**	**0.91**
31-B028	31-B028-2.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
31-B028	PL-505-112613	PCB IRM Confirmation Sampling	DUP	11/26/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B017	32-B017-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B017	32-B017-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B018	32-B018-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	**0.07J**	**0.05J**	<0.049	**0.12**
32-B018	32-B018-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.048	<0.048	<0.048	<0.048	**0.066J**	**0.13J**	**0.059J**	**0.255**
32-B019	32-B019-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	**0.29J**	**0.26J**	**0.12J**	**0.67**
32-B019	32-B019-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	**0.055J**	**0.13J**	**0.063J**	**0.248**
32-B020	32-B020-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B020	32-B020-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B020	PL-501-112513	PCB IRM Confirmation Sampling	DUP	11/25/2013	4.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B021	32-B021-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B021	32-B021-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	**0.088J**	**0.15J**	**0.06J**	**0.298**
32-B022	32-B022-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
32-B023	32-B023-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.098	<0.098	<0.098	<0.098	**0.38J**	**0.57J**	**0.22J**	**1.17**
32-B024	32-B024-2.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	2.0	<12	<12	<12	<12	<12J	**83J**	**36J**	**119**
32-B024	PL502-112513	PCB IRM Confirmation Sampling	DUP	11/25/2013	2.0	<12	<12	<12	<12	**52J**	**80J**	**35J**	**167**
32-B024	32-B024-4.0	PCB IRM Confirmation Sampling	ORG	11/25/2013	4.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.055**	<0.049	**0.055**
32-B025	32-B025-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<1.5UJ	<1.5UJ	<1.5UJ	**4.4J**	<1.5UJ	**0.6J**	**0.24J**	**5.24**

TABLE B-2
PCB CONCENTRATIONS IN SOIL - INITIAL IM WORK PLAN

Location ID	Field Sample ID	Sampling Program	Sample Type	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
32-B025	32-B025-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**1.9**	**3.1**	**1.2**	**6.2**
32-B026	32-B026-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<0.5	<0.5	<0.5	**1.8J**	<0.5	**0.31J**	**0.13J**	**2.24**
32-B026	32-B026-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B027	32-B027-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<1	<1	<1	**13J**	<1	**2.5J**	**1.2J**	**16.7**
32-B027	32-B027-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<15	<15	<15	**46J**	<15	**2.3J**	**1.2J**	**49.5**
32-B028	32-B028-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<0.05	<0.05	<0.05	**0.15**	<0.05	<0.05	<0.05	**0.15**
32-B028	32-B028-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**1.3J**	**2.5J**	**1.1J**	**4.9**
32-B028	PL-503-112613	PCB IRM Confirmation Sampling	DUP	11/26/2013	2.5	<0.25	<0.25	<0.25	<0.25	**0.94J**	**2.1J**	**0.91J**	**3.95**
32-B029	32-B029-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<0.05	<0.05	<0.05	**0.056**	<0.05	<0.05	<0.05	**0.056**
32-B029	32-B029-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<9.9	<9.9	<9.9	**36J**	<9.9	**1.7J**	**0.94J**	**38.64**
32-B030	32-B030-1.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	1.5	<0.05	<0.05	<0.05	<0.05	**0.21J**	**0.24J**	**0.13J**	**0.58**
32-B030	32-B030-2.5	PCB IRM Confirmation Sampling	ORG	11/26/2013	2.5	<0.05	<0.05	<0.05	**0.24**	<0.05	**0.24**	**0.095**	**0.575**
32-B031	32-B031-3.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	3.0	<0.05	<0.05	<0.05	**0.1J**	<0.05	**0.053J**	<0.05	**0.153**
32-B032	32-B032-3.0	PCB IRM Confirmation Sampling	ORG	11/26/2013	3.0	<0.25	<0.25	<0.25	<0.25	**1.7J**	**2.2J**	**0.95J**	**4.85**
32-B033	32-B033-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.4J**	**0.68J**	**0.34J**	**1.42**
32-B033	32-B033-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<0.25	<0.25	<0.25	<0.25	**0.49J**	**0.9J**	**0.4J**	**1.79**
32-B033	32-B033-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<0.99	<0.99	<0.99	<0.99	<0.99	**13J**	**5.4J**	**18.4**
32-B034	32-B034-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.25	<0.25	<0.25	**0.97J**	<0.25	**0.76J**	**0.49J**	**2.22**
32-B034	32-B034-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<0.15	<0.15	<0.15	<0.15	**0.3J**	**0.46J**	**0.21J**	**0.97**
32-B034	PL-507-12022013	PCB IRM Confirmation Sampling	DUP	12/2/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.26J**	**0.35J**	**0.17J**	**0.78**
32-B034	32-B034-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<1	<1	<1	<1	**1.9**	**3.3**	**1.4**	**6.6**
32-B035	32-B035-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.25	<0.25	<0.25	**0.82J**	<0.25	**0.82J**	**0.4J**	**2.04**
32-B035	32-B035-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.054J**	**0.072J**	<0.05	**0.126**
32-B035	32-B035-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B036	32-B036-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.05	<0.05	<0.05	0.35J	<0.05	**0.085J**	<0.05	**0.435**
32-B036	32-B036-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.15J**	**0.21J**	**0.076J**	**0.436**
32-B036	32-B036-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B037	32-B037-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.1	<0.1	<0.1	**0.56J**	<0.1	**0.44J**	**0.21J**	**1.21**
32-B037	32-B037-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<0.5	<0.5	<0.5	<0.5	**1.2J**	**1.9J**	**0.83J**	**3.93**
32-B037	PL-508-12022013	PCB IRM Confirmation Sampling	DUP	12/2/2013	1.0	<0.099	<0.099	<0.099	<0.099UJ	**0.33J**	**0.52J**	**0.25J**	**1.1**
32-B037	32-B037-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<2.5	<2.5	<2.5	<2.5	**4.6**	**11**	**5.9**	**21.5**
32-B038	32-B038-1.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1J**	**0.92J**	**0.49J**	**2.41**
32-B038	32-B038-3.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	3.0	<2.5	<2.5	<2.5	**9J**	<2.5	**0.97J**	**0.32J**	**10.29**
32-B038	32-B038-6.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	6.0	<0.5	<0.5	<0.5	<0.5	**1.4J**	**2.2J**	**1J**	**4.6**
32-B039	32-B039-7.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	7.0	<0.5	<0.5	<0.5	<0.5	<0.5	**3.9J**	**1.6J**	**5.5**
32-B040	32-B040-7.0	PCB IRM Confirmation Sampling	ORG	12/2/2013	7.0	<1	<1	<1	<1	<1	**2.7J**	**1.2J**	**3.9**
BL10-B030	BL10-B030-0.5	PCB IRM Confirmation Sampling	ORG	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.067**	<0.05	**0.067**
BL10-B031	BL10-B031-0.5	PCB IRM Confirmation Sampling	ORG	12/5/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.47J**	**0.31J**	**0.78**
BL10-B031	PL-509-12052013	PCB IRM Confirmation Sampling	DUP	12/5/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	**0.11J**	**0.073J**	**0.183**
BL10-B032	BL10-B032-0.5	PCB IRM Confirmation Sampling	ORG	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.1J**	**0.067J**	**0.167**
BL10-B033	BL10-B033-0.5	PCB IRM Confirmation Sampling	ORG	12/5/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.15**	**0.11**	**0.26**
BL10-B034	BL10-B034-1.0	PCB IRM Confirmation Sampling	ORG	12/5/2013	1.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.11J**	**0.073J**	**0.183**
31-B017	31-B017-1.5	PCB IRM Delineation Sampling	ORG	11/13/2013	1.5	<0.5	<0.5	<0.5	<0.5	**1.2J**	**1.4J**	**0.86J**	**3.46**
31-B017E	31-B017E-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	<0.049	ND
31-B017N	31-B017N-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	**0.052J**	**0.053J**	<0.05	**0.105**
31-B017S	31-B017S-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
31-B017W	31-B017W-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.5	<0.5	<0.5	<0.5	**0.99J**	**1.4J**	**0.79J**	**3.18**
32-B001	32-B001-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**0.54J**	**0.092J**	<0.05	**0.632**
32-B001E	32-B001E-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**1.1J**	**1.4J**	**0.59J**	**3.09**

HARGIS + ASSOCIATES, INC.

TABLE B-2
PCB CONCENTRATIONS IN SOIL - INITIAL IM WORK PLAN

Location ID	Field Sample ID	Sampling Program	Sample Type	Sample Date	Sample Depth	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
32-B001N	32-B001N-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<1.5	<1.5	<1.5	<1.5	**7.2J**	**2J**	**0.51J**	**9.71**
32-B001S	32-B001S-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.99	<0.99	<0.99	<0.99	**11J**	**3.3J**	**1.1J**	**15.4**
32-B001W	32-B001W-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B006	32-B006-3.0	PCB IRM Delineation Sampling	ORG	11/13/2013	3.0	<0.05	<0.05	<0.05	<0.05	**0.16**	**0.27**	**0.15**	**0.58**
32-B006E	32-B006E-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.98	<0.98	<0.98	<0.98	**9.3J**	**4.8J**	**2.6J**	**16.7**
32-B006N	32-B006N-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B006S	32-B006S-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<2.5	<2.5	<2.5	<2.5	**9.5J**	**15J**	**9J**	**33.5**
32-B006W	32-B006W-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
32-B008	32-B008-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<1.5	<1.5	<1.5	<1.5	**8.1J**	**11J**	**4.6J**	**23.7**
32-B008E	32-B008E-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.21J**	**0.31J**	**0.13J**	**0.65**
32-B008E	PL-507-1113A	PCB IRM Delineation Sampling	DUP	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**2.4J**	**1.6J**	**0.27J**	**4.27**
32-B008N	32-B008N-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.1J**	**0.2J**	**0.12J**	**0.42**
32-B008S	32-B008S-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.2J**	**0.34J**	**0.15J**	**0.69**
32-B008W	32-B008W-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**1.3J**	**1.9J**	**0.84J**	**4.04**
32-B012	32-B012-6.0	PCB IRM Delineation Sampling	ORG	11/13/2013	6.0	<0.49	<0.49	<0.49	<0.49	**0.68J**	**1.2J**	**0.6J**	**2.48**
32-B012	PL-506-1113	PCB IRM Delineation Sampling	DUP	11/13/2013	6.0	<2.5	<2.5	<2.5	<2.5	**4.8J**	**9.3J**	**4.2J**	**18.3**
32-B012E	32-B012E-5.0	PCB IRM Delineation Sampling	ORG	11/13/2013	5.0	<0.049	<0.049	<0.049	<0.049	<0.049	**0.38**	<0.049	**0.38**
32-B012N	32-B012N-5.0	PCB IRM Delineation Sampling	ORG	11/13/2013	5.0	<0.049	<0.049	<0.049	<0.049	**0.06J**	**0.059J**	<0.049	**0.119**
32-B012S	32-B012S-5.0	PCB IRM Delineation Sampling	ORG	11/13/2013	5.0	<0.5	<0.5	<0.5	<0.5	**0.96**	**1.8**	**0.74**	**3.5**
32-B012W	32-B012W-5.0	PCB IRM Delineation Sampling	ORG	11/13/2013	5.0	<0.05	<0.05	<0.05	<0.05	**0.13J**	**0.077J**	<0.05	**0.207**
BL10-B024E	BL10-B024E-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL10-B024N	BL10-B024N-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.085**	**0.059**	**0.144**
BL10-B024S	BL10-B024S-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
BL10-B024W	BL10-B024W-0.5	PCB IRM Delineation Sampling	ORG	11/13/2013	0.5	<0.05	<0.05	<0.05	<0.05	<0.05	**0.076J**	**0.05J**	**0.126**
SC-02	PL-505-1113	PCB IRM Delineation Sampling	DUP	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**1.1J**	**1.8J**	**0.86J**	**3.76**
SC-02	SC-02-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.5	<0.5	<0.5	<0.5	**0.67J**	**1.2J**	**0.62J**	**2.49**
SC-02E	SC-02E-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.5J**	**0.78J**	**0.42J**	**1.7**
SC-02N	SC-02N-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**1.6J**	**1.3J**	**0.62J**	**3.52**
SC-02S	SC-02S-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.25	<0.25	<0.25	<0.25	**0.61J**	**1.1J**	**0.5J**	**2.21**
SC-02W	SC-02W-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<1	<1	<1	<1	**1.8J**	**2.7J**	**1.7J**	**6.2**
SC-03	SC-03-2.0	PCB IRM Delineation Sampling	ORG	11/13/2013	2.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
SC-03E	PL-507-1113	PCB IRM Delineation Sampling	DUP	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**2.4J**	**0.77J**	**0.37J**	**3.54**
SC-03E	SC-03E-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	**0.27J**	**0.16J**	**0.088J**	**0.518**
SC-03N	SC-03N-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05	ND
SC-03S	SC-03S-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.5	<0.5	<0.5	<0.5	**0.83J**	**0.59J**	**0.22J**	**1.64**
SC-03W	SC-03W-1.0	PCB IRM Delineation Sampling	ORG	11/13/2013	1.0	<0.49	<0.49	<0.49	<0.49	**3.1J**	**0.95J**	**0.33J**	**4.38**

Notes:

< = Less than. Concentration was not detected greater than the detection limit

J = Estiamted Value

Cocentration of individual aroclor is greater than the cleanup level of 0.22 mg/kg

Total PCB concentration (sum of all detected aroclors for a given sample) is greater than the US EPA TSCA level of 50 mg/kg

mg/kg = milligram per kilogram

US EPA TSCA = US Environmental Protection Agency - Toxic Substance Control Act

All results are in mg/kg

All detections are **bold**

ORG = Original Sample

DUP = Duplicate Sample

HARGIS + ASSOCIATES, INC.

TABLE B-3
ROLL-OFF BIN SAMPLE RESULTS

Location ID	Field Sample ID	Sampling Program	Sample Type	Sample Date	Aroclor 1016	Aroclor 1221	Aroclor 1232	Aroclor 1242	Aroclor 1248	Aroclor 1254	Aroclor 1260	Total PCBs
Bin #10	PCB-DIS-010	PCB Waste Characterization Sampling	ORG	3/26/2014	<0.5	<0.5	<0.5	<0.5	<0.5	**1.1**	**0.54**	**1.64**
Bin #14	PCB-DIS-014	PCB Waste Characterization Sampling	ORG	12/12/2013	<5.0	<5.0	<5.0	**55**	<5.0	<5.0	<5.0	**55**
Bin #15	PCB-DIS-015	PCB Waste Characterization Sampling	ORG	12/12/2013	<2.5	<2.5	<2.5	**2.7**	<2.5	<2.5	<2.5	**2.7**
Bin #17	PCB-DIS-017	PCB Waste Characterization Sampling	ORG	3/26/2014	<0.049	<0.049	<0.049	<0.049	<0.049	**0.12**	**0.088**	**0.208**
Bin #22	PCB-DIS-022	PCB Waste Characterization Sampling	ORG	3/26/2014	<0.5	<0.5	<0.5	<0.5	**1.5**	**1.5**	**0.84**	**3.84**
Bin #24	PCB-DIS-024	PCB Waste Characterization Sampling	ORG	12/12/2013	<0.5	<0.5	<0.5	<0.5	**0.67**	**1.3**	**0.62**	**2.59**
Bin #25	PCB-DIS-025	PCB Waste Characterization Sampling	ORG	12/12/2013	<2.5	<2.5	<2.5	**4.9**	<2.5	<2.5	<2.5	**4.9**
Bin #26	PCB-DIS-026	PCB Waste Characterization Sampling	ORG	12/12/2013	<2.5	<2.5	<2.5	<2.5	**3.5**	**2.9**	<2.5	**6.4**
Bin #27	PCB-DIS-027	PCB Waste Characterization Sampling	ORG	12/12/2013	<2.5	<2.5	<2.5	<2.5	<2.5	**4.1**	<2.5	**4.1**
Bin #28	PCB-DIS-028	PCB Waste Characterization Sampling	ORG	12/12/2013	<0.05	<0.05	<0.05	<0.05	**0.25**	**0.32**	**0.15**	**0.72**
Bin #29	PCB-DIS-029	PCB Waste Characterization Sampling	ORG	12/12/2013	<2.5	<2.5	<2.5	<2.5	**4.1**	**6.1**	**4.4**	**14.6**

Notes:

< = Less than. Concentration was not detected greater than the detection limit

J = Estiamted Value

Cocentration of individual aroclor is greater than the cleanup level of 0.22 mg/kg

Total PCB concentration (sum of all detected aroclors for a given sample) is greater than the US EPA TSCA level of 50 mg/kg

mg/kg = milligram per kilogram

US EPA TSCA = US Environmental Protection Agency - Toxic Substance Control Act

All results are in mg/kg

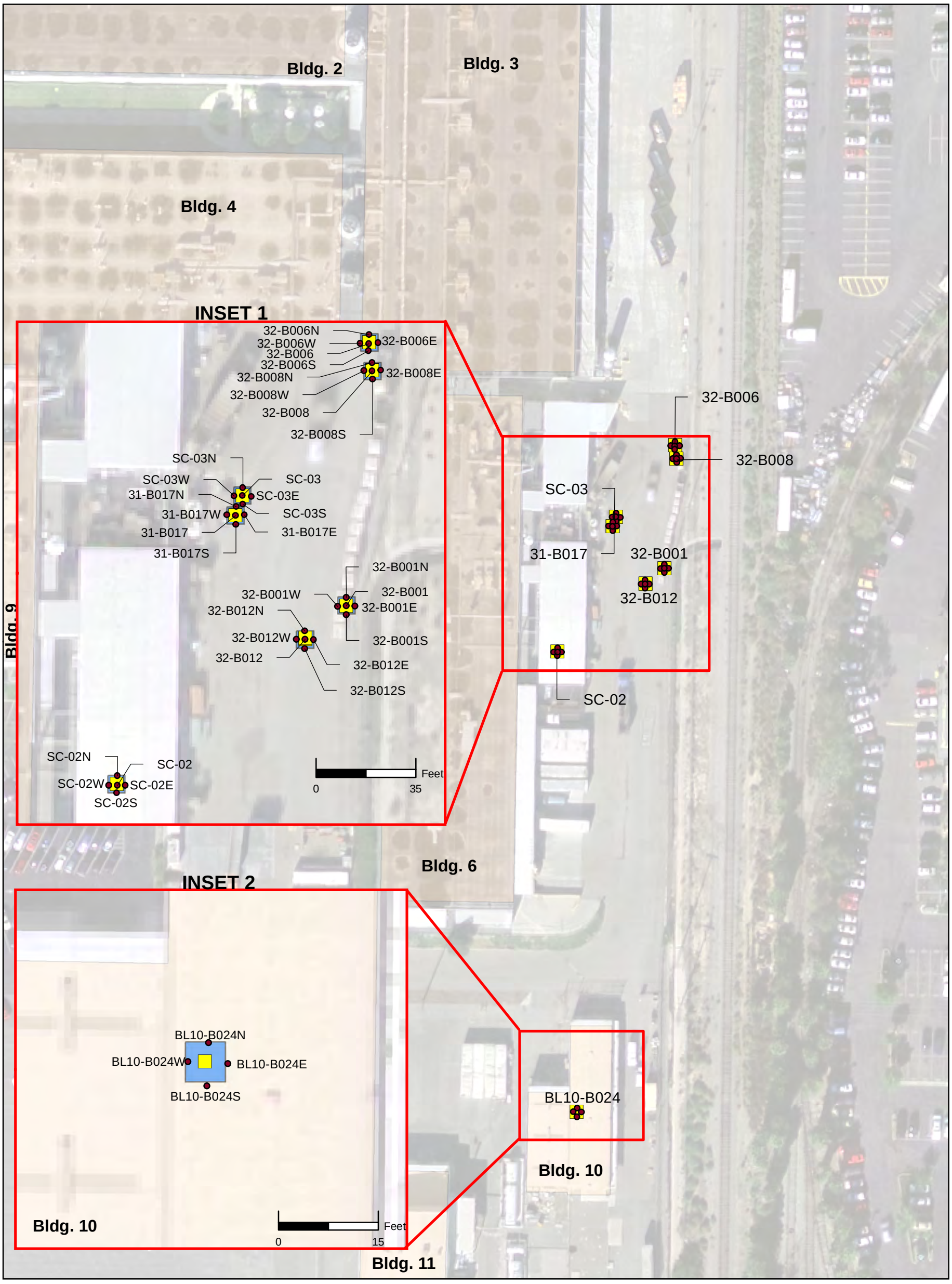
All detections are **bold**

ORG = Original Sample

DUP = Duplicate Sample

APPENDIX B

FIGURES



EXPLANATION

- PCB Delineation Sample Location
- Exceedance Point
- Initial PCB IM Excavation Area

N

Feet
0
75

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

PCB EXCEEDANCE POINTS AND
IRM DELINEATION SAMPLE LOCATIONS

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

5/21/2014

FIGURE B-1

PREP BY DAT REV BY MRL RPT NO 1156.04

Bldg. 2

Bldg. 3

Bldg. 4

INSET 1

32-B017
32-B021
32-B018
32-B022
32-B020
32-B019
32-B023
32-B024

31-B019
31-B020
31-B027
31-B026
31-B021
31-B025
31-B022
31-B027
31-B024
31-B023

32-B030
32-B025
32-B031
29-B007
32-B029
32-B027
32-B034
32-B026
32-B033
32-B032
32-B038
32-B028
32-B039
32-B035
32-B040
32-B036
32-B037

29-B011
29-B010
29-B009
29-B017
29-B016
29-B018
29-B015
29-B012
29-B014
29-B013

0 35 Feet

Bldg. 9

32-B006 / 32-B008 Excavation

SC-03 / 310B017 Excavation

32-B001 Excavation

32-B012 Excavation

SC-02 Excavation

Bldg. 6

INSET 2

BL10-B034
BL10-B031
BL10-B030
BL10-B032
BL10-B033

0 25 Feet

Bldg. 10

BL10-B024 Excavation

Bldg. 10

Bldg. 11

Path: P:\Project Storage\Beckman\Fullerton\GIS Files\Maps\1156.04 PCB Addendum\Appendix B\Figure B-2 confirmation sample locations.mxd

EXPLANATION

- Confirmation Sample Location, Total PCBs > 0.22 mg/kg
- Confirmation Sample Location, Total PCBs < 0.22 mg/kg
- PCB IM Excavation Area

N

0 75 Feet

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

PCB IRM CONFIRMATION SAMPLE LOCAITONS

HARGIS + ASSOCIATES, INC.
HYDROGEOLOGY • ENGINEERING

5/21/2014

FIGURE B-2

PREP BY DAT REV BY MRL RPT NO 1156.04

ATTACHMENT B-1

WASTE MANIFESTS AND US ECOLOGY TICKETS

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000580372 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
X	1. UN3077, ENVIRONMENTALLY HAZARDOUS SUBSTANCES, SOLID, n.o.s., (SOIL W/ 55 PPM PCB), 9, III	1	CM	11000	K	261
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -|- 1) ERG:171 W:521962 A:070211542-1
O.O.S DATE 03-13-14 ; UNIQUE ID# PCB-DIS-014

BIN# VES-14 DISPOSAL PO# 5010098361

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley McCarley — Signature — Month 03 Day 25 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ARMANDO VILLEGAS — Signature — Month 03 Day 25 Year 14

Transporter 2 Printed/Typed Name: QUINTIN LARSON — Signature — Month 3 Day 25 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Salisbury — Signature — Month 3 Day 26 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136048

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R40

Manifest #:000580372VES

Date: 3/26/2014
Time In: 11:20 AM
Time Out: 12:31 PM

In: 68720 lb
Out: 39860 lb
Net: 28860 lb

Net Tons:14.43 tons
Net Kg: 13091 kilograms

RS1

Please print or type. (Form designed for use on elite (12-pitch) typewriter.) Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652512 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER,INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER,INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -/- 1) W:521928 A:USE-070211542-1

BIN # 10 DISPOSAL PO #5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lessly Mejia — Signature — Month 04 Day 03 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ARMANDO VILLEGAS — Signature — Month 04 Day 03 Year 14

Transporter 2 Printed/Typed Name: RODNEY BEARD — Signature — Month 4 Day 3 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Theresa Buchanan — Signature — Month 4 Day 4 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

US Ecology, Inc.

Ticket: 136495

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652512VES

Date: 4/4/2014
Time In: 07:39 AM
Time Out: 09:15 AM

In: 65080 lb
Out: 41540 lb
Net: 23540 lb

Net Tons:11.77 tons
Net Kg: 10678 kilograms

R51

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652506 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER,INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER,INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -|- 1) W:521928 A:USE-070211542-1

BIN# 15 DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley McClarty
Signature:
Month 3 Day 27 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name:
Signature:
Month 3 Day 27 Year 14

Transporter 2 Printed/Typed Name: Rodney Beard
Signature:
Month 3 Day 27 Year 14

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Emily Salisbury
Signature:
Month 3 Day 28 Year 2014

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

15.7

USEcology, Inc.

Ticket: 136164

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652506VES

Date: 3/28/2014
Time In: 07:26 AM
Time Out: 09:04 AM

In: 66300 lb
Out: 40380 lb
Net: 25920 lb

Net Tons:12.96 tons
Net Kg: 11757 kilograms

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652514 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -I- 1) W:521928 A:USE-070211542-1

BIN #17 DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley Mellor | Signature | Month 4 | Day 7 | Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name | Signature | Month 4 | Day 7 | Year 14

Transporter 2 Printed/Typed Name: Mike Richardson | Signature | Month 4 | Day 8 | Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) | U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) | Month | Day | Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Salisbury | Signature | Month 4 | Day 8 | Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136595

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R45

Manifest #:000652514VES

Date: 4/8/2014
Time In: 10:19 AM
Time Out: 11:28 AM

In: 54820 lb
Out: 40580 lb
Net: 14240 lb

Net Tons:7.12 tons
Net Kg: 6459 kilograms

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652513 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER,INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER,INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS + 1) W:521928 A:USE-070211542-1

BIN # VEA# 22 DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lessly Melara — Signature — Month 4 Day 4 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: MAX Andrade — Signature — Month 4 Day 4 Year 14

Transporter 2 Printed/Typed Name: M.K. Richardson — Signature — Month 4 Day 7 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Schlesinger — Signature — Month 4 Day 7 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

'14 APR 7 AM 7:2

USEcology, Inc.

Ticket: 136546

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R45

Manifest #:000652513VES

Date: 4/7/2014
Time In: 11:30 AM
Time Out: 01:01 PM

In: 66740 lb
Out: 42660 lb
Net: 24080 lb

Net Tons:12.04 tons
Net Kg: 10923 kilograms

R51

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652503 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number
NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number
CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number
NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -|- 1) W:521928 A:USE-070211542-1
BIN # Vest # 24
DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley Millerton
Signature
Month 4 Day 1 Year 14

INTL

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Mark Andrade
Signature
Month 4 Day 1 Year 14

Transporter 2 Printed/Typed Name: Rodney Beard
Signature
Month 4 Day 1 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Salisbury
Signature
Month 4 Day 2 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

'14 APR 1 AM 7:5

US Ecology, Inc.

Ticket: 136351

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652503VES

Date: 4/2/2014
Time In: 07:19 AM
Time Out: 08:10 AM

In: 62600 lb
Out: 40740 lb
Net: 21860 lb

Net Tons:10.93 tons
Net Kg: 9916 kilograms

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652504 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -|- 1) W:521928 A:USE-070211542-1

BIN # VES 25

DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lessly Mcclarley
Signature:
Month 03 Day 26 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ARMANDO VILLEGAS
Signature:
Month 03 Day 26 Year 14

Transporter 2 Printed/Typed Name: Tony Newlan
Signature:
Month 03 Day 26 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Salisbury
Signature:
Month 3 Day 27 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136109

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R29

Manifest #:000652504VES

Date: 3/27/2014
Time In: 09:58 AM
Time Out: 12:01 PM

In: 62140 lb
Out: 38920 lb
Net: 23220 lb

Net Tons:11.61 tons
Net Kg: 10532 kilograms

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652505 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number: NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number: CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number: NVT330010000

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -I- 1) W:521928 A:USE-070211542-1
BIN# VES 26
DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lessly Melara
Signature:
Month 03 Day 26 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: ARMANDO VILLEGAS
Signature:
Month 03 Day 26 Year 14

Transporter 2 Printed/Typed Name: Rodney Beard
Signature:
Month 3 Day 26 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number
Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Emily Salisbury
Signature:
Month 3 Day 27 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136090

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652505VES

Date: 3/27/2014
Time In: 07:11 AM
Time Out: 08:07 AM

In: 64360 lb
Out: 40640 lb
Net: 23720 lb

Net Tons:11.86 tons
Net Kg: 10759 kilograms

R51

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652502 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number
NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number
CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number
NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -|- 1) W:521928 A:USE-070211542-1
Ves
BIN# 27
DISPOSAL PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley McCarley
Signature:
Month 4 Day 2 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials
Transporter 1 Printed/Typed Name: MAX
Signature:
Month 4 Day 2 Year 14
Transporter 2 Printed/Typed Name: Rodney Beard
Signature:
Month 4 Day 2 Year 14

DESIGNATED FACILITY

18. Discrepancy
18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection
Manifest Reference Number:
18b. Alternate Facility (or Generator) U.S. EPA ID Number
Facility's Phone:
18c. Signature of Alternate Facility (or Generator) Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)
1. H132 2. 3. 4.

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a
Printed/Typed Name: Emily Salisbury
Signature:
Month 4 Day 3 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136431

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652502VES

Date: 4/3/2014
Time In: 08:00 AM
Time Out: 09:54 AM

In: 65380 lb
Out: 40320 lb
Net: 25060 lb

Net Tons:12.53 tons
Net Kg: 11367 kilograms

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652508 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER,INC
250 S. KRAEMER BLVD.
M/S B1.SE.03
BREA, CA 92822

Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER,INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS

U.S. EPA ID Number
NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC

U.S. EPA ID Number
CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003

Facility's Phone: 800 239-3943

U.S. EPA ID Number
NVT330010000

9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -I- I) W:521928 A:USE-070211542-1

BIN # Vest #28 DISPOSAL PO # 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley Mellerts
Signature:
Month: 3 Day: 31 Year: 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name:
Signature:
Month: 3 Day: 31 Year: 14

Transporter 2 Printed/Typed Name: Rodney Beard
Signature:
Month: 3 Day: 31 Year: 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator)
U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator)
Month: Day: Year:

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Cheryl Barnacastle
Signature:
Month: 4 Day: 1 Year: 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

'14 MAR 31 PM 5:1

'14 MAR 31 AM 10:14

US Ecology, Inc.

Ticket: 136283

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652508VES

Date: 4/1/2014
Time In: 08:00 AM
Time Out: 11:38 AM

In: 63360 lb
Out: 40780 lb
Net: 22580 lb

Net Tons:11.29 tons
Net Kg: 10242 kilograms

1251

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

Form Approved. OMB No. 2050-0039

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator ID Number	2. Page 1 of	3. Emergency Response Phone	4. Manifest Tracking Number
CAD008254708	1	(877) 818-0087	000652507 VES

GENERATOR

5. Generator's Name and Mailing Address
BECKMAN COULTER, INC
250 S. KRAEMER BLVD.
M/S B1 SE.03
BREA, CA 92822
Generator's Phone: 714 961-3408

Generator's Site Address (if different than mailing address)
BECKMAN COULTER, INC
4300 N. HARBOR BLVD
FULLERTON, CA 92834

6. Transporter 1 Company Name
VEOLIA ES TECHNICAL SOLUTIONS
U.S. EPA ID Number
NJD080631369

7. Transporter 2 Company Name
REMEDIAL TRANSPORTATION SERVIC
U.S. EPA ID Number
CAR000181560

8. Designated Facility Name and Site Address
US ECOLOGY, INC.
HWY 95, 12 MILES S OF BEATTY
BEATTY, NV 89003
Facility's Phone: 800 239-3943
U.S. EPA ID Number
NVT330010000

9a. HM	9b. U.S. DOT Description (Including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No.	10. Containers Type	11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
	1. NON-RCRA HAZARDOUS WASTE SOLID, (SOIL)	1	CM	16	Y	611
	2.					
	3.					
	4.					

14. Special Handling Instructions and Additional Information
ER Service Contracted by VESTS -I- I) W:521928 A:USE-070211542-1

BIN # VES-29

Disposal PO# 5010098360

15. **GENERATOR'S/OFFEROR'S CERTIFICATION:** I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent.
I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.

Generator's/Offeror's Printed/Typed Name: Lesley McCarty — Signature — Month 3 Day 28 Year 14

INT'L

16. International Shipments ☐ Import to U.S. ☐ Export from U.S. Port of entry/exit:
Transporter signature (for exports only): Date leaving U.S.:

TRANSPORTER

17. Transporter Acknowledgment of Receipt of Materials

Transporter 1 Printed/Typed Name: Eddie Melhado — Signature — Month 3 Day 28 Year 14

Transporter 2 Printed/Typed Name: Rodney Beard — Signature — Month 3 Day 31 Year 14

DESIGNATED FACILITY

18. Discrepancy

18a. Discrepancy Indication Space ☐ Quantity ☐ Type ☐ Residue ☐ Partial Rejection ☐ Full Rejection

Manifest Reference Number:

18b. Alternate Facility (or Generator) — U.S. EPA ID Number

Facility's Phone:

18c. Signature of Alternate Facility (or Generator) — Month Day Year

19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)

1.	2.	3.	4.
H132			

20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a

Printed/Typed Name: Cheryl Baumann — Signature — Month 3 Day 31 Year 14

EPA Form 8700-22 (Rev. 3-05) Previous editions are obsolete.

DESIGNATED FACILITY TO DESTINATION STATE (IF REQUIRED)

USEcology, Inc.

Ticket: 136217

US Ecology Nevada
11 Miles South of Beatty
Beatty, NV 89003

Vehicle: R51

Manifest #:000652507VES

Date: 3/31/2014
Time In: 10:42 AM
Time Out: 11:55 AM

In: 67540 lb
Out: 40160 lb
Net: 27380 lb

Net Tons:13.69 tons
Net Kg: 12419 kilograms

APPENDIX C

CEQA IS/MND MEMORANDUM

MEMORANDUM

May 28, 2014

To:
Heather Allen
Planning Project Manager, City of Fullerton

From:
James Kurtz
Manager of Air Quality and Noise Programs

Subject: Beckman Coulter Facility Demolition and Remediation Project

---

An Initial Study/Mitigated Negative Declaration (IS/MND) for the Beckman Coulter Facility Demolition and Remediation Project was prepared in August 2013 and approved by the City in September 2013.

Due to the discovery of greater quantities of polychlorinated biphenyl (PCB) impacted soil on the project site than anticipated, Beckman Coulter, Inc. (Beckman, Project Applicant) has submitted a revised grading plan (Building Permit application number GRA13-00023) to accommodate the removal of the PCB-impacted soil that differs from that described and analyzed in the IS/MND. A revised grading plan has been submitted to the City Community Development Department, Building Division and a copy is provided in Attachment 1 to this memorandum. The proposed approach for removal and remediation of the contaminated PCB is described in the *Polychlorinated Biphenyl Interim Remedial Measure Work Plan Addendum* (PCB IRM Work Plan Addendum) prepared by Hargis + Associates dated April 7, 2014 (H+A 2014) on behalf of Beckman, provided in Attachment 2 to this memorandum.

In summary, based on available information at the time the IS/MND was prepared, the Project Applicant assumed that the hauling of PCB-contaminated waste would require up to 2 round truck trips total (4 one-way trips). Due to the amount of PCB impact soils that was subsequently identified, the proposed project will require the excavation and hauling of an additional approximately 426 truckloads of PCB-impacted soil to appropriate disposal sites. More on-site construction equipment than was analyzed in the IS/MND may also be needed.

BonTerra Psomas has reviewed the potential air quality, greenhouse gas (GHG) emissions, and noise impacts for the proposed change in the remediation and removal process for PCB-contaminated soils. The details of these reviews are included in Attachment 3, Air Quality/Greenhouse Gas Emissions Analysis for Excavation and Removal of PCB-impacted soil for the Beckman Coulter Facility, and Attachment 4, Noise Impact Analysis for Excavation and Removal of PCB-impacted soil for the Beckman Coulter Facility. Each analysis used conservative assumptions to analyze the potential impact of the revised remediation processes.

Air pollutant emissions were estimated for two scenarios: (1) If no additional construction equipment is used for soil excavation, stockpiling, and loading beyond that assumed in the IS/MND; and (2) if the amount of on-site construction equipment is doubled in order to accelerate the remediation process. The air quality analysis shows that the maximum daily emission rate of oxides of nitrogen (NOx), the pollutant of concern, would not exceed the South Coast Air Quality

Management District (SCAQMD) CEQA threshold, if truck haul trips do not exceed 30 round trips per day without additional construction equipment use or 17 round trips per day if the quantity of construction equipment on site would be doubled. The impact would be less than significant consistent with the conclusions of the IS/MND, and no new mitigation measures beyond those identified in the IS/MND are required.

The GHG emissions analysis shows that the project would continue to be consistent with the Fullerton Climate Action Plan. The impact would be less than significant, and no new mitigation measures are required.

The noise analysis shows that the increase in daytime noise attributable to the possible additional construction equipment on site may be noticeable at the nearest sensitive receptors, or the noise may be masked by traffic noise on Lambert Road, Harbor Boulevard, and Superior Avenue. There would be no change in nighttime noise impacts. Noise from additional truck trips would be negligible. The impacts would be less than significant consistent with the conclusions of the IS/MND, and no new mitigation measures are required.

The PCB IRM Work Plan Addendum is currently under review by the California Department of Toxic Substances Control (DTSC) and work is expected to begin in mid-June subject to receipt of, and addressing any comments from DTSC and the City.

Please contact Jim Kurtz at (714) 444-9199 if you have questions.

Attachments: 1 – Revised Grading Plan (3 drawings)
2 – PCB IRM Work Plan Addendum (in separate file)
3 – Air Quality and Greenhouse Gas Emissions Analysis
4 – Noise Impact Analysis

cc: Ms. Lessly McCarley, Beckman Coulter, Inc.
Mr. William Jeffers, California Department of Toxic Substances Control
Ms. Carolyn Yee, California Department of Toxic Substances Control
Mr. Michael Long, Hargis + Associates
Mr. Don Moore, ER&FS

R:\Projects\Hargis\J0001\Draft Memo_H Allen Beckman Coulter Remediation-052814.docx

ATTACHMENT 1

REVISED GRADING PLAN

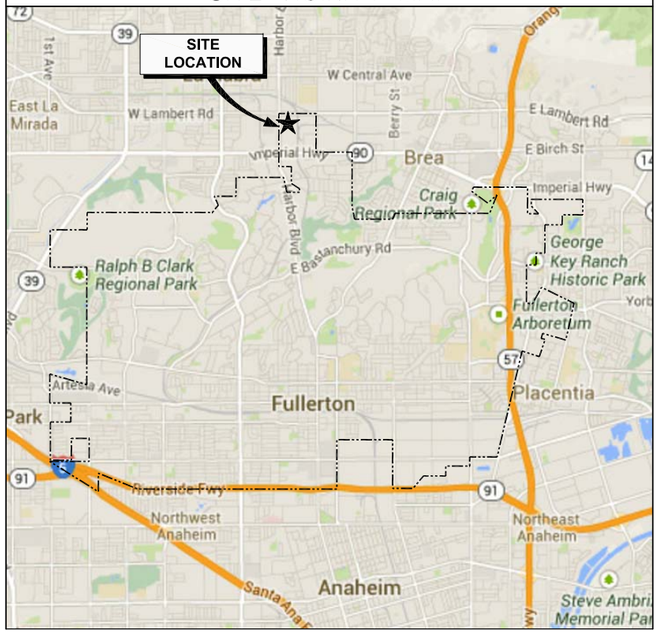
BECKMAN COULTER, INC.

4300 N. HARBOR BOULEVARD
FULLERTON, CALIFORNIA

INTERIM GRADING PLAN FOR PILOT TEST AND INTERIM REMEDIAL MEASURE

Revised Plan submitted on 4-23-2014
to City of Fullerton Building Dept for review.

SITE VICINITY MAP



DRAWING INDEX

DRAWING NUMBER	DRAWING TITLE	CAD FILE NO.	REV
G-1	TITLE SHEET AND DRAWING INDEX	640-0182.dwg	2
C-1	SITE PLAN	550-0886.dwg	3
C-2	DETAILS	550-0889.dwg	0

ENGINEERED GRADING INSPECTION CERTIFICATE

PROPERTY ADDRESS: 4300 N. HARBOR BOULEVARD, FULLERTON, CA. 92835

PROPERTY OWNER: BECKMAN COULTER, INC. 250 S. KRAEMER BOULEVARD, BREA, CA. 92821

GRADING CERTIFICATION

BY CIVIL ENGINEER

I CERTIFY TO THE SATISFACTORY COMPLETION OF GRADING IN ACCORDANCE WITH THE APPROVED PLANS. ALL DRAINAGE DEVICES REQUIRED BY THE GRADING PERMIT, GRADING PLANS AND GRADING ORDINANCE HAVE BEEN INSTALLED. EROSION TREATMENT OF SLOPES AND IRRIGATION SYSTEMS (WHERE REQUIRED) HAVE BEEN INSTALLED. ADEQUATE PROVISIONS HAVE BEEN MADE FOR DRAINAGE OF SURFACE WATERS FROM EACH BUILDING SITE AS OF THIS DATE

LOT NOS. _____

CIVIL ENGINEER _____ REG. NO. _____
(SIGNATURE) DATE _____

GEOTECHNICAL ENGINEER:

ALBUS-KEEFE & ASSOCIATES, INC.
1011 NORTH ARMANDO ST.
ANAHEIM, CA 92806-2606
SEE REPORT DATED 3-21-14
CONTACT: ENRIQUE RIUTORT, G.E. 2683
714-630-1626
2

ASSESSOR'S PARCEL NUMBERS:

296-411-01
296-201-01

EARTHWORK QUANTITIES (ESTIMATED):

2 2

CUT: 75,600 CU. YDS. FILL: 61,500 CU. YDS.
EXPORT: 10,000 CU. YDS. IMPORT: 0 CU. YDS.
DISPOSAL SITE: OFF-SITE OVER EXCAVATION: 0 CU. YDS.

TOPOGRAPHY SOURCE:

ARROWHEAD MAPPING CORPORATION
AERIAL TOPOGRAPHIC 09-12-2012

HORIZONTAL DATUM: OCS GPS # 3867 & # 3868
VERTICAL DATUM: OCSBM 2B-50-05, NAVD88 ELEVATION = 304.47'

LEGAL DESCRIPTION:

PARCEL 1:

A PORTION OF THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 9, TOWNSHIP 3 SOUTH, RANGE 10 WEST, S.B.B. & M. IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

TO WIT:

BEGINNING AT THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SAID SECTION 9, RUNNING THENCE EASTERLY PARALLEL WITH THE NORTH LINE OF SAID SECTION, 660 FEET; THENCE SOUTHERLY PARALLEL WITH THE WEST LINE OF THE SAID SECTION 313.84 FEET; THENCE WESTERLY PARALLEL WITH THE NORTH LINE OF SAID SECTION 660 FEET; THENCE NORTHERLY PARALLEL WITH THE WEST LINE OF SAID SECTION 313.84 FEET TO THE POINT OF BEGINNING, CONTAINING 4.755 ACRES OF LAND, MORE OR LESS.

PARCEL 2:

THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 9, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA S.B.B. & M., EXCEPTING THERFROM THE FOLLOWING:

A PORTION OF THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 9, TOWNSHIP 3 SOUTH, RANGE 10 WEST, S.B.B. & M. IN THE COUNTY OF ORANGE, STATE OF CALIFORNIA, DESCRIBED AS FOLLOWS:

BEGINNING AT THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SAID SECTION 9, RUNNING THENCE EASTERLY PARALLEL WITH THE NORTH LINE OF SAID SECTION, 660 FEET; THENCE SOUTHERLY PARALLEL WITH THE WEST LINE OF THE SAID SECTION 313.84 FEET; THENCE WESTERLY PARALLEL WITH THE NORTH LINE OF SAID SECTION 660 FEET; THENCE NORTHERLY PARALLEL WITH THE WEST LINE OF SAID SECTION 313.84 FEET TO THE POINT OF BEGINNING, CONTAINING 4.755 ACRES OF LAND, MORE OR LESS.

ALSO EXCEPTING THERFROM THAT PORTION OF THE SAID LAND AS DEEDED TO LOS ANGELES AND SALT LAKE RAILWAY COMPANY.

A DEED DATED DECEMBER 26, 1951, AND RECORDED ON JANUARY 23, 1952, WAS VESTED IN BECKMAN INSTRUMENTS, INC. FOR PARCEL NUMBER 296-411-01.

THE LEGAL DESCRIPTIONS OF THE SUBJECT PARCELS ARE AS FOLLOW:

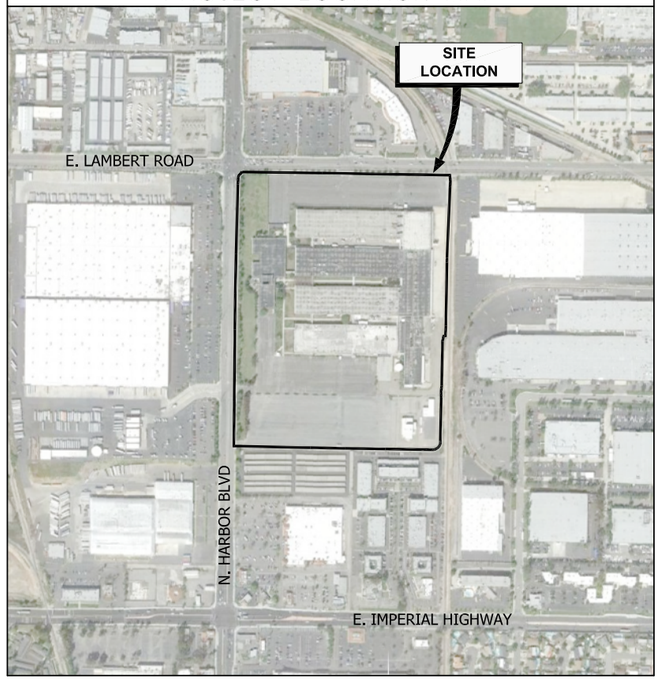
ALL THAT CERTAIN PIECE OR PARCEL OF LAND BEING A PORTION OF THE NORTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 9, TOWNSHIP 3 SOUTH, RANGE 10 WEST, OF THE SAN BERNARDINO PRINCIPAL MERIDIAN, ORANGE COUNTY, STATE OF CALIFORNIA.

A DEED DATED JULY 16, 1960, AND RECORDED ON JULY 18, 1960, WAS VESTED IN BECKMAN INSTRUMENTS, INC. FOR PARCEL NUMBER 296-201-01. THIS IS THE LAST RECORDED TRANSACTION FOR THESE PARCELS.

THE LEGAL DESCRIPTIONS OF THE SUBJECT PARCELS ARE AS FOLLOW:

THE NORTH 10.00 ACRES OF THE SOUTHWEST QUARTER OF THE SOUTHEAST QUARTER OF SECTION 9, TOWNSHIP 3 SOUTH, RANGE 10 WEST, IN THE RANCHO SAN JUAN CAJON DE SANTA ANA, CITY OF FULLERTON, AS SAID SECTION IS SHOWN ON A MAP RECORDED IN BOOK 51, PAGE 7 OF MISCELLANEOUS MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

PROJECT LOCATION MAP



REV	DATE	DE	PM	CHK'D	ISSUE
2	4/22/14				REVISION FOR ADDITIONAL REMEDIATION
1	11/13/13				CITY OF FULLERTON
0	10/21/13				CLIENT REVIEW

HARGIS+ASSOCIATES, INC
9171 TOWNE CENTRE DRIVE, SUITE 375 TEL (858) 455-6500
SAN DIEGO, CA 92122 FAX (858) 455-6533

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

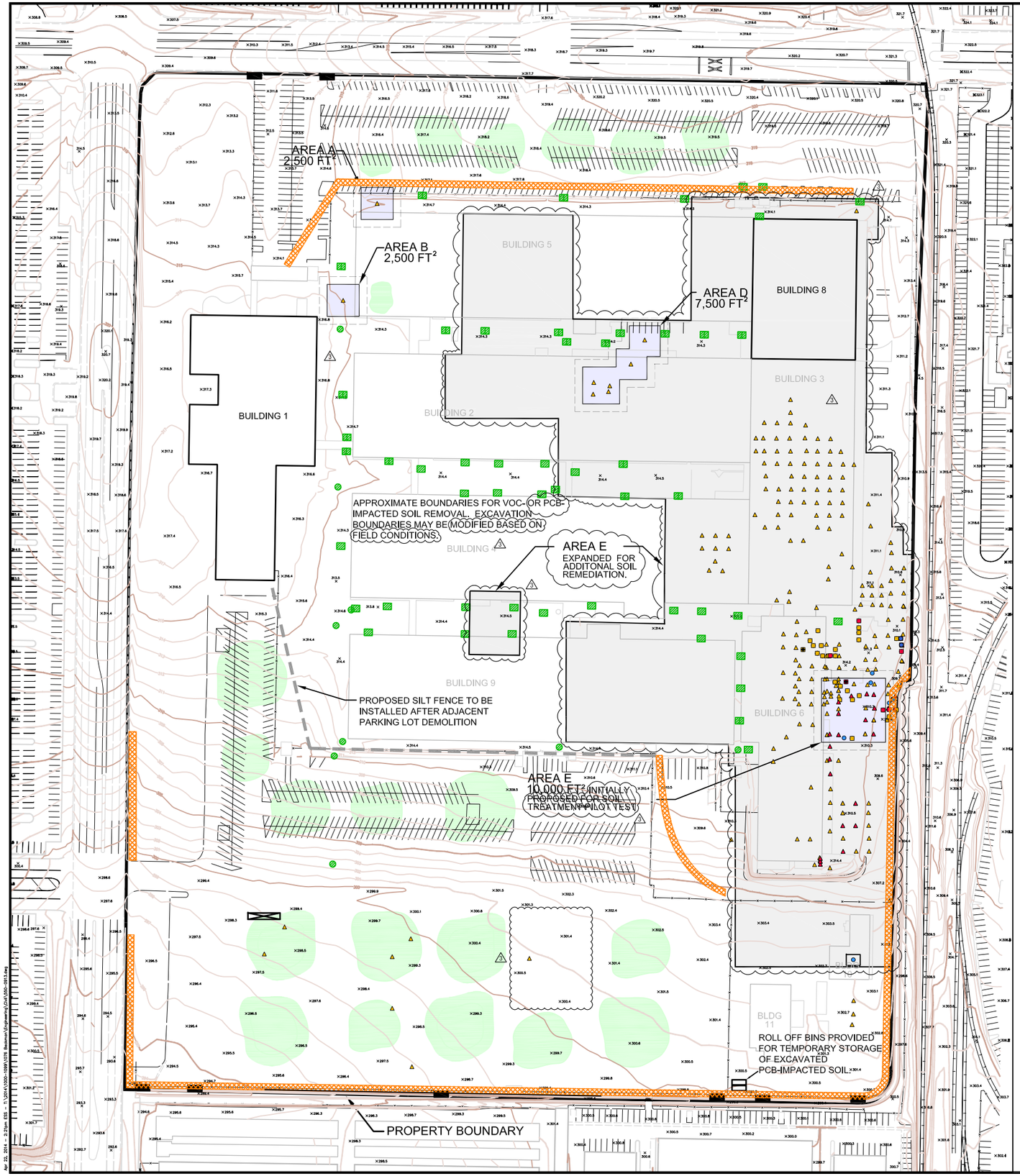
INTERIM GRADING PLAN FOR
PILOT TEST AND INTERIM REMEDIAL MEASURE
TITLE SHEET AND DRAWING INDEX

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHER ELLIS
C69250
EXP. 6/30/14
CIVIL
STATE OF CALIFORNIA

DATE: 4/22/14
PROJECT NO: 1029.51
FILENAME: 640-0182

SHEET:
G-1

Revised plan submitted on 4-23-2104 to
City of Fullerton Building Dept. for review.



Explanation

- Exceeds Residential Risk-Based Concentrations for VOCs
- Exceeds Commercial/Industrial Risk-Based Concentrations for VOCs
- Exceeds PCB residential and/or commercial/industrial RSL
- Exceeds Residential RSL for VOCs
- Exceeds Commercial/Industrial RSL for VOCs
- Expected limits of VOC-impacted excavation for Initial Pilot Test (subject to field verification sampling)
- Potential area for VOC- and PCB-impacted excavation for complete Site Corrective Action, (subject to field verification sampling) 3
- Limit of Excavation, including slopeback or benching.
- Clean overburden or treated soil stockpile approximate location. Stockpiles will only be placed greater than 50 feet away from any storm water inlet. Stockpile management will be in accordance with CASQA WM-3 and the SWPPP
- Proposed silt fence to be installed after removal of adjacent parking lot, detail SE-1 on Sheet C-2
- Storm drain Inlet, detail SE-10 Type 3 on Sheet C-2
- Sand bag barrier, gravel bag berm, or fiber rolls, details SE-5 and SE-8 on Sheet C-2. Two layers of sand or gravel bags are acceptable.
- Storm Drain Inlet, detail SE-10 Type 2 on Sheet C-2
- Stabilized construction Entrance / Exit, (approximate location) detail TC-1 on Sheet C-2

Acronyms and Abbreviations

bcy	Bank cubic yards
BMP	Best Management Practices
CAL/OSHA	California Occupational Safety and Health Administration
CASQA	California Stormwater Quality Association
cy	Cubic yards
DTSC	California Department of Toxic Substances Control
ft	Feet
ft²	Feet squared
PCBs	Polychlorinated biphenyls
RSL	Environmental Protection Agency Regional Screening Level
SCAQMD	South Coast Air Quality Management District
Site	4300 N. Harbor Boulevard, Fullerton, CA
SWPPP	Storm Water Pollution Prevention Plan
VOCs	Volatile organic compounds

0 80 160
FEET

Project Design Features:

The project consists of soil remediation of VOC-Impacted soil and PCB-Impacted soil:

A. VOC-Impacted soil ~~(described in Note 4a)~~ will be excavated from Areas A, B, D, and E, treated on-Site, and temporarily stockpiled on-Site. Excavated areas will be backfilled with treated soil and/or soil from an on-Site borrow source. ~~See Note 4 for more information.~~ 3

B. PCB-Impacted soil ~~(described in Note 4)~~ will be excavated from Area E ~~from Areas PCB-1 through PCB-5, placed in~~ direct-loaded into covered roll-off bins or trucks, and transported off-Site for disposal.

The project does not include any building improvements or finished site grading components. Following completion of soil remediation activities, a Grading Plan/Building Permit application for development of the property will be submitted by others. Fill will consist of treated soil and/or on-Site borrow source material. No imported fill material will be used. Fill shall be compacted ~~to a minimum 90% relative compaction (as determined by ASTM D1557)~~ (Note 10).

Regulatory Requirements:

1. Lead agency overseeing remediation activities at the Site is California Department of Toxic Substances Control (DTSC).
2. Compliance with SCAQMD Rule 1166 and Rule 403, as described in the Site-Specific Contaminated Soil Mitigation Plan No, 555976, prepared by Yorke Engineering, LLC (attached),
3. Compliance with SCAQMD Site-specific Permit to Operate ~~(permit pending)~~ (Permit No. G28721) 3
4. Compliance with the Storm Water Pollution Prevention Plan, prepared by The Source Group, Inc. (attached).
5. City of Fullerton Building/Grading Permit.

Project Description:

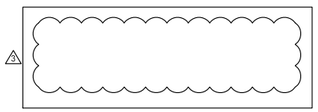
The purpose of the project is to: 3

- Conduct an Interim Remedial Measure to excavate approximately ~~20,000~~ bank cubic yards(bcy) of PCB-Impacted soil and transport off-Site for disposal at an appropriate, permitted facility.
- Conduct an on-Site Pilot Test for treatment of VOC-Impacted soil. Approximately ~~6,700~~ 65,600 bcy of VOC-Impacted soil will be treated on-Site by evaporative desorption technology (SCAQMD Site-Specific Permit ~~pending~~ G28721.) Treated soil will be stockpiled and ~~covered with plastic~~ managed in accordance with CASQA WM-3 and the SWPPP) in the north and south parking lots for post-treatment verification sampling prior to reuse as on-Site fill material. 3

The excavation areas identified in this Interim Grading Plan are preliminary and will be verified in the field. This Interim Grading Plan does not represent finished grade. Backfill will occur in areas when clean fill material is available. Clean fill material will include un-impacted soil removed for slopeback, soil treatment to below clean-up levels, and/or soil from an on-Site borrow source. ~~A subsequent Grading Plan submittal will delineate additional excavation areas for completion of soil corrective action, followed by~~ A subsequent Grading Plan (will be submitted by others) for future development of the property. DTSC is the lead agency overseeing all remedial activities at the Site. 3

General Notes:

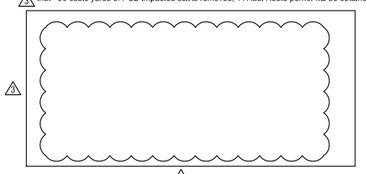
1. The following buildings ~~are scheduled for demolition prior to implementation of this Grading Plan~~ have been demolished: Buildings 2, 3, 4, 5, 6, 9, 10, and 11. Above grade features ~~will also be~~ have been removed including a carport, internal roads, and interior landscaping. Asphalt and concrete surfaces ~~will have also be~~ been removed for the areas requiring remediation (e.g, areas east of Buildings 3 and 6). Buildings 1 and 8 will remain. Building 8 will be maintained to support the soil remediation activities, soil stockpile staging, and dust/air emissions control. Building 8 will be demolished at the conclusion of remediation activities or to access impacted soils.
2. Contractor will determine the location and extent of utilities and monitor wells in the work areas prior to beginning excavation.
3. Excavation activities will be conducted in compliance with SCAQMD Rule 1166 and Rule 403, as described in the Site-Specific Contaminated Soil Mitigation Plan No. 555976 (attached), prepared by Yorke Engineering, LLC. 3
4. Impacted Soil Quantities:
   a. The following estimated volumes of VOC- and PCB-Impacted soil will be excavated, VOC-Impacted and PCB-Impacted soil will be segregated. VOC-Impacted soil will be treated on site. PCB-Impacted soil will be profiled and hauled to an appropriate, permitted disposal facility. Limits of excavations will be confirmed with verification sampling. Total volume of excavated VOC and PCB-Impacted soil is anticipated to be ~~6,000~~ 75,600 bcy. Soil removed for excavation sloping or benching will be assumed to be clean and will be stockpiled near the excavation. ~~and covered with plastic.~~



Revised Estimated Volume of VOC- and PCB-Impacted Soil

Excavation Location	Area (ft²)	Depth (ft)	Volume (bcy)	Volume (loose cy)
Area A	2500	8	741	889
Area B	2500	8	741	889
Area D	17,500	8	5,185	6,222
Area E (up to 8 ft depth)	146,110	3 - 8	40,514	48,618
Area E (20 ft depth)	38,415	20	28,456	34,147
Total			**75,600**	**90,800**

   b. ~~The following estimated volumes of~~ All PCB-Impacted soil will be excavated, ~~placed in covered direct-loaded~~ in roll-off bins or trucks, profiled, and hauled to an appropriate, permitted disposal facility. Limits of excavations will be confirmed with verification. Total volume of excavated PCB-Impacted soil is anticipated to be ~~20 to 40~~ approximately 10,000 bank cy, and is included in the table in Note 4a, Revised Estimated Volume of VOC- and PCB-Impacted Soil. ~~In the event that >50 cubic yards of PCB-Impacted soil is removed,~~ A Haul Route permit will be obtained from the City of Fullerton prior to transportation from the Site.



Revised Estimated Volume of PCB-Impacted Soil (included in volume above)

Area (ft²)	Depth (ft)	Volume (bcy)	Volume (loose cy)

The total volume of PCB-impacted soil is estimated to be 10,000 bcy and is included in the table in Note 4a (above). **Revised Estimated Volume of VOC- and PCB-Impacted Soil.** All PCB-impacted soil will be segregated from VOC-only impacted soil, direct loaded in roll-off bins or trucks, and hauled off-site to an appropriate, permitted disposal facility.

5. Contractor will slope, or bench or shore all excavations over 5'-0 (5 feet, 0 Inches) deep In accordance with applicable CAL/OSHA requirements. All applicable city of Fullerton requirements, and the attached geotechnical report, prepared by Albus-Keefe & Associates, Inc.
6. Contractor will comply with the requirements of the Stormwater Pollution Prevention Plan (SWPPP), prepared by The Source Group, Inc, (attached). Per SWPPP requirements, the following erosion and sediment controls will be Implemented: perimeter control, track-out control, bermed Isolation of soil excavation areas, stockpile controls, and storm-drain Inlet controls.
7. Approved erosion and sedimentation protection devices shall be provided and maintained and shall be in place at the end of each day's work.
8. Dust shall be controlled by watering.
9. Open excavations will be delineated by caution tape at a minimum distance of 6 feet from the top edge of the completed excavation (unless obstructed).
10. Fill soils shall be placed in horizontally oriented lifts of 12 inches or less, moisture conditioned, as needed, and compacted ~~to a minimum 90% relative compaction (as determined by ASTM D1557).~~
11. All dirt, sand, mud, or debris deposited or spilled upon public streets during any grading, hauling, or export operations shall be immediately cleaned up by the developer, his contractor, subcontractors, or agents to the satisfaction of the City Engineer. Failure to do so will be cause for stopping of all such grading, hauling, or export work by the City until such time as the streets are cleaned.
12. Sanitary facilities shall be maintained on Site from beginning to completion of grading operations per City of Fullerton Regulation on Construction Sanitary Facility.
13. Existing fire apparatus access roads will remain In place while any buildings remain on the property during this project.
14. This project shall comply with the 2010 California Fire Code.
15. The manual gate(s) at the Site will be equipped with approved Knox padlocks.
16. There are 2 entrances to the site, on the West boundary (Harbor Blvd) and one on the North boundary (Lambert Rd.) Only the west entrance on Harbor Blvd, will be used for construction vehicles,

REV	DATE	CHK'D	PM	DE
3	4/22/14			
2	11/20/13			
1	11/13/13			
0	10/21/13			

REVISION FOR ADDITIONAL SOIL REMEDIATION
APPROVED FOR PERMIT
CITY OF FULLERTON
CLIENT REVIEW
ISSUE

HARGIS+ASSOCIATES, INC
9171 TOWNE CENTRE DRIVE, SUITE 375 TEL (858) 455-6500
SAN DIEGO, CA 92122 FAX (858) 455-6533

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

INTERIM GRADING PLAN FOR PILOT TESTING AND INTERIM REMEDIAL MEASURE SITE PLAN

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHER LYLES
C69250
EXP. 6/30/14
CIVIL
STATE OF CALIFORNIA

DATE: 4/22/14
PROJECT NO: 1076.08
FILENAME: 550-0913

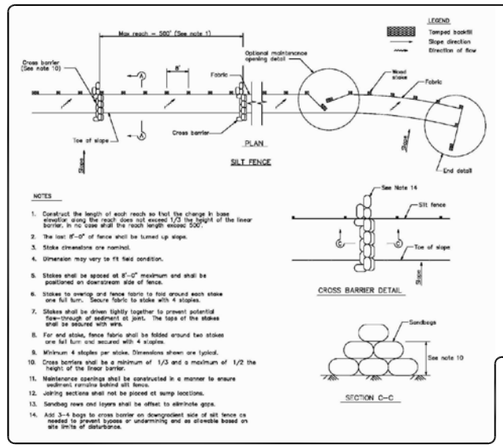
SHEET:
C-1

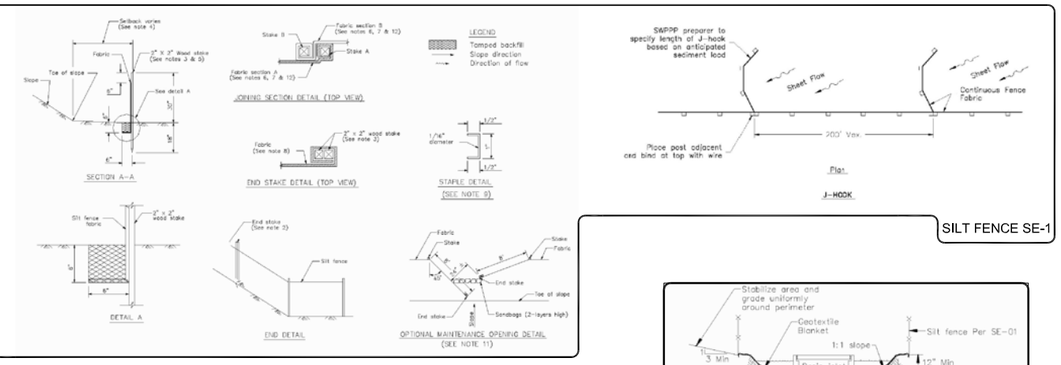
Apr 22, 2014 - 2:29pm ESS - N:\2014\1000-1099\1076 Beckman\Engineering\Civil\1000-GR1.dwg

No.	Mitigation Measure	Monitoring Timing/Frequency	Reporting Requirements	Enforcing, Monitoring Agency
MM CR-4	In the event that human remains are unearthed during excavation and grading activities of any future project, all activity shall cease immediately. Pursuant to State Health and Safety Code Section 7050.5, no further disturbance shall occur until the County coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner shall within 24 hours notify the Native American Heritage Commission (NAHC). The NAHC shall then contact the most likely descendant of the deceased Native American, who shall serve as consultant on how to proceed with the remains.	During Ground-Altering Activities	On-Site Monitor Report to Orange County Coroner's Office, if Human Remains are Discovered	City of Fullerton Community Development Department
PDF Cult-1	The project proponent shall retain the services of a qualified Architectural Historian who meets the Secretary of Interior's Professional Qualification Standards to provide demolition and construction monitoring, and to provide input and review of the proposed demolition/construction plan documents prior to implementation of project activities. A post-construction survey shall also be undertaken to document that adverse effects have not occurred to the Beckman Coulter Administration Building. The post-construction survey report shall be prepared as a letter report to the City of Fullerton Community Development Department.	During Demolition Activities	On-Site Monitor Post-Construction Survey Report to the City of Fullerton	City of Fullerton Community Development Department
MM Cult-1	In the event that cultural resources (archaeological, historical, paleontological) resources are inadvertently unearthed during excavation activities associated with soil remediation, the contractor shall immediately cease all earth-disturbing activities within a 100-foot radius of the area of discovery. The project proponent shall retain a qualified professional (i.e., archaeologist, historian, architect, paleontologist, Native American Tribal monitor), subject to approval by the City of Fullerton, to evaluate the significance of the find and determine an appropriate course of action. If avoidance of the resource(s) is not feasible, salvage operation requirements pursuant to Section 15064.5 of the State CEQA Guidelines shall be followed. After the find has been appropriately avoided or mitigated, work in the area may resume.	During Ground-Altering Activities	Retention of a Professional Archaeologist, Paleontologist, and/or Native American Monitor / Completion of Salvage Operations, as appropriate	City of Fullerton Community Development Department
MM HAZ-2	Prior to potential remedial excavation and grading activities, impacted areas shall be cleared of all maintenance equipment and materials (e.g., solvents, grease, waste-oil), construction materials, miscellaneous stockpiled debris (e.g., scrap metal, pallets, storage bins, construction parts), above ground storage tanks, surface trash, piping, excess vegetation and other deleterious materials. These materials shall be removed off-site and properly disposed of at an approved disposal facility. Once removed, a visual inspection of the areas beneath the removed materials shall be performed. Any stained soils observed underneath the removed materials shall be sampled. In the event concentrations of materials are detected above regulatory cleanup levels during demolition or construction activities, the project Applicant shall comply with the following measures in accordance with Federal, State, and local requirements: • Excavation and disposal at a permitted, off-site facility; • On-site remediation, if necessary; or • Other measures as deemed appropriate by the City of Fullerton Fire Department.	Prior to Remedial Excavation, if Necessary and/or Issuance of Grading Permits	Completion of Further Sampling/ Remediation Activities, if Necessary/ Issuance of Grading Permits	City of Fullerton Community Development Department
MM HYD-1	Prior o issuance of any Grading or Building Permit, and as part of the future development's compliance with the NPDES requirements, a Notice of Intent shall be prepared and submitted to the Santa Ana RWQCB providing notification and intent to comply with the State of California General Construction Permit. Also, a Stormwater Pollution Prevention Plan (SWPPP) shall be reviewed and approved by the Director of Engineering for water quality construction activites on site. A copy of the SWPPP shall be available and implemented at the construction site at all times. The SWPPP shall outline the source control and/or treatment control BMPs to avoid or mitigate runoff pollutants at the constuction site to the "maximum extent practicable." All recommendations in the SWPPP shall be implemented during area preparation, grading, and construction. The project applicant shall comply with each of the recommendations detailed in the SWPPP, and other such measure(s) as the City deems necessary to mitigate potenial stormwater runoff impacts.	Prior to Issuance of Grading or Building Permits	Proof of NOI Submittal / Submittal and Approval of SWPPP / Issuance of Grading or Building Permit	City of Fullerton Community Development Department and Engineering Department
MM N-2	Project applicants shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.	Prior to Issuance of a Grading Permit / Site Inspections During Construction	Review and Approval of Contract Specifications/ Issuance of Grading Permits/ Site Inspections	City of Fullerton Community Development Department and Engineering Department
MM N-4	The City shall require future developments to implement the following measures to reduce the potential for architectural/structural damage resulting from elevated groundborne noise and vibration levels: • Pile driving within a 50-foot radius of historic structures shall utilize alternative installation methods where possible (e.g., pile cushioning, jetting, predrilling, cast-in-place systems, resonance-free vibratory pile drivers). • The preexisting condition of all designated historic buildings within a 50-foot radius of proposed construction activities shall be evaluated during a preconstruction survey. The preconstruction survey shall determine conditions that exist before construction begins for use in evaluating damage caused by construction activities. Fixtures and finishes within a 50-foot radius of construction activities susceptible to damage shall be documented (photographically and in writing) prior to construction. All damage shall be repaired back to its preexisting condition. • Vibration monitoring shall be conducted prior to and during pile driving operations occurring within 100 feet of the historic structures. Every attempt shall be made to limit construction-generated vibration levels in accordance with Caltrans recommendations during pile driving and impact activities in the vicinity of the historic structures.[1]	Prior to Issuance of a Grading Permit / Inspections During Pile Driving Operations	Submittal and Approval of Pre-Construction Surveys / Ongoing During Construction	City of Fullerton Community Development Department and Engineering Department

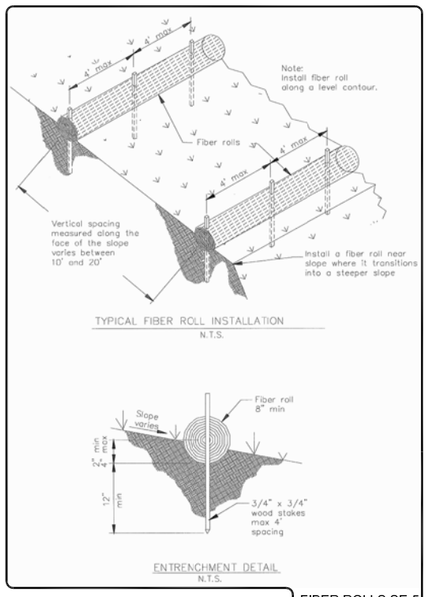
1 Pile driving would not be used for proposed demolition and remediation activities; therefore, the 1st and 3rd bulleted items are not applicable to the proposed project.

RR NSE-1	Consistent with City of Fullerton Noise Ordinance, noise-generating project demolition activities shall be limited to between the hours of 7:00 AM and 8:00 PM except on Sunday or a City-recognized holiday. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements.	During Construction Activities	Ongoing During Construction	City of Fullerton Engineering Department
MM NSE-1	If remediation activities occur between the hours 10:00 and 7:00 AM on a weekday, or on a Sunday or a City-recognized holiday, operation of diesel powered construction equipment outdoors shall be limited to one piece of equipment at one time, such as a loader or backhoe. The maximum noise level of the equipment shall not exceed 80 dBA at a distance of 50 feet. This requirement shall be stated in the project specifications. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements during remediation.	Prior to Issuance of a Grading Permit / Site Inspections During Remediation	Review and Approval of Contractor Specifications/ Ongoing during Remediation	City of Fullerton Community Development Department and Engineering Department

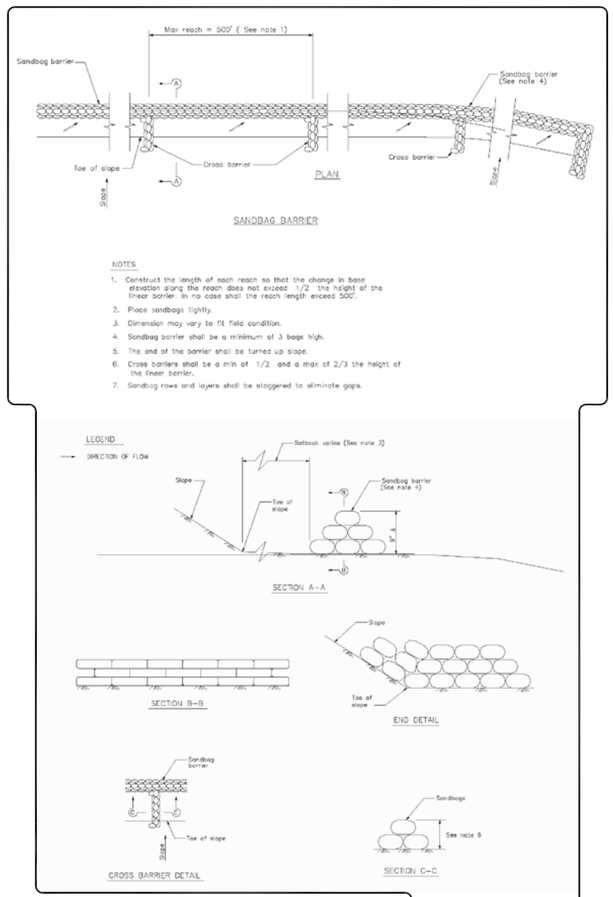




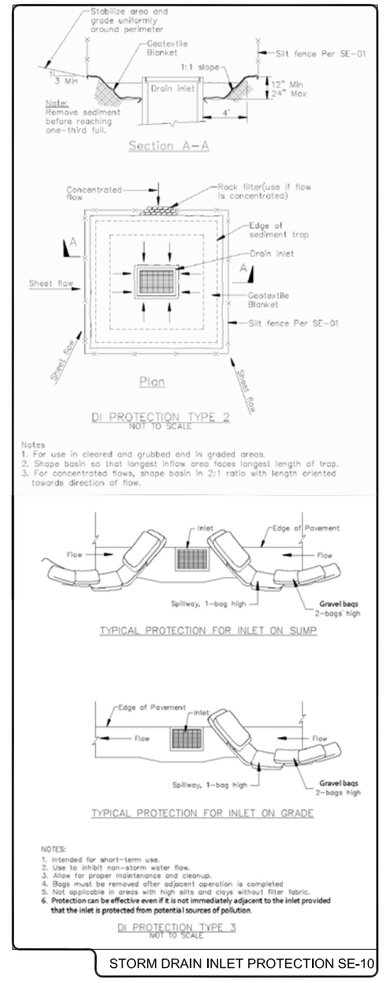
SILT FENCE SE-1



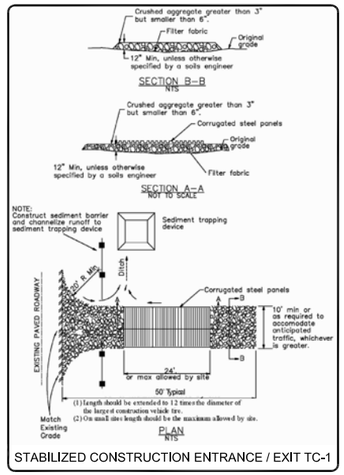
FIBER ROLLS SE-5



SANDBAG BARRIER SE-8



STORM DRAIN INLET PROTECTION SE-10



STABILIZED CONSTRUCTION ENTRANCE / EXIT TC-1

REFERENCES: SE-1, SE-5, SE-8, SE-10 AND TC-1 ARE GENERALIZED STANDARD DETAILS FOR BEST MANAGEMENT PRACTICES (BMPs) AS OUTLINED IN THE "BEST MANAGEMENT PRACTICE FACT SHEETS FROM THE CALIFORNIA STORMWATER QUALITY ASSOCIATION (CASQA) STORMWATER BEST MANAGEMENT HANDBOOK PORTAL: CONSTRUCTION. ACTUAL INSTALLATION DETAILS MAY VARY IN ACCORDANCE WITH THE SWPPP.

REV	ISSUE	CHK'D	PM	DE	DATE
0	CITY OF FULLERTON				11/13/13

HARGIS+ASSOCIATES, INC
9171 TOWNE CENTRE DRIVE, SUITE 375
SAN DIEGO, CA 92122
TEL (858) 455-6500
FAX (858) 455-6533

BECKMAN COULTER, INC.
FULLERTON, CALIFORNIA

INTERIM GRADING PLAN FOR PILOT TESTING AND INTERIM REMEDIAL MEASURE DETAILS

REGISTERED PROFESSIONAL ENGINEER
CHRISTOPHER J. LEES
C69250
EXP. 6/30/14
CIVIL
STATE OF CALIFORNIA

DATE: 11/13/13
PROJECT NO: 1029.51
FILENAME: 550-0889

SHEET: C-2

Apr 16, 2014 - 11:18am ESS - S:\2013\1000-1099\1029 Beckman Fullerton\Engineering\Draft\550-0889.dwg

ATTACHMENT 3

AIR QUALITY/GREENHOUSE GAS EMISSIONS ANALYSIS FOR EXCAVATION AND REMOVAL OF PCB-IMPACTED SOIL FOR THE BECKMAN COULTER FACILITY

AIR QUALITY AND GREENHOUSE GAS EMISSIONS ANALYSIS FOR EXCAVATION AND REMOVAL OF PCB-IMPACTED SOIL FOR THE BECKMAN COULTER FACILITY

Beckman Coulter Inc. (BCI) (Project Applicant) proposes to excavate, test, segregate, and remove polychlorinated biphenyl (PCB) impacted soil from the project site at the southeast of the corner of North Harbor Boulevard and Lambert Road in the City of Fullerton, Orange County, California. On-site remediation of non-PCB-impacted contaminated soil is continuing at the project site as originally proposed. The initial remediation plan assumed that offsite disposal of 40 cubic yards (CY) of PCB-impacted soil would be required (2 round trips). Discovery of greater quantities of PCB-impacted soil than anticipated from initial testing requires that more PCB-contaminated soils be disposed of off-site. The Project Applicant now proposes to excavate and remove approximately 16,000 tons (11,000 CY) of PCB-impacted soil, resulting in approximately 426 truck trips (round trips) more than analyzed in the IS/MND. The destination for disposal of the soil is dependent on the concentration of PCB's in the soil. Additionally, the Project Applicant has determined that the operation of more excavation and soil handling construction equipment may be needed compared to what was analyzed in the IS/MND. The Project Applicant is requesting a revision to the project which would allow for an increase in truck trips and/or onsite construction equipment. It is not anticipated that more than 20 round trips would be required on any given day. However, this analysis has been prepared to demonstrate the amount that could occur on a daily basis, with or without an increase in the operation of onsite construction equipment, without resulting in a significant air quality impact.

The additional truck trips and construction equipment operations would generate air pollutant and greenhouse gas (GHG) emissions.

The following mitigation measure (MM) identified in The Fullerton Plan EIR is incorporated as part of the proposed project and assumed in the analysis and emissions modeling presented in this section. This MM has been included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM AQ-1 Prior to issuance of any Grading Permit, the Community Development Director and the Building Official shall confirm that the Grading Plan, Building Plans, and specifications stipulate that, in compliance with SCAQMD Rule 403, excessive fugitive dust emissions shall be controlled by regular watering or other dust prevention measures, as specified in the SCAQMD's Rules and Regulations. In addition, SCAQMD Rule 402 requires implementation of dust suppression techniques to prevent fugitive dust from creating a nuisance off-site. Implementation of the following measures would reduce short-term fugitive dust impacts on nearby sensitive receptors:

- All active portions of the construction site shall be watered twice daily to prevent excessive amounts of dust;
- Non-toxic soil stabilizers shall be applied to all inactive construction areas (previously graded areas inactive for 20 days or more, assuming no rain), according to manufacturers' specifications;

- All excavating and grading operations shall be suspended when wind gusts (as instantaneous gust) exceed 25 miles per hour;
- On-site vehicle speed shall be limited to 15 miles per hour;
- All on-site roads shall be paved as soon as feasible, watered twice daily, or chemically stabilized;
- Visible dust beyond the property line which emanates from the project shall be prevented to the maximum extent feasible;
- All material transported off-site shall be either sufficiently watered or securely covered to prevent excessive amounts of dust prior to departing the job site;
- Track-out devices shall be used at all construction site access points;
- All delivery truck tires shall be watered down and/or scraped down prior to departing the job site;
- A construction relations officer shall be appointed to act as a community liaison concerning on-site construction activity including resolution of issues related to fugitive dust generation;
- Streets shall be swept at the end of the day if visible soil material is carried onto adjacent paved public roads and use of SCAQMD Rule 1186 and 1186.1 certified street sweepers or roadway; and
- Replace ground cover in disturbed areas as quickly as possible.

Air Quality – Criteria Pollutant Emissions

The pollutant of concern for construction operations on the project is oxides of nitrogen (NOx). The IS/MND for the project indicated that peak daily NOx emissions during the remediation phase would be 29 pounds per day, which is less than the South Coast Air Quality Management District (SCAQMD) significant impact threshold of 100 pounds per day.[1]

In the PCB IM Work Plan Addendum (included in Attachment 2) the following landfills were identified for potential waste disposal:

- Orange County Municipal Landfill Olinda Alpha, located in Brea, California;
- Simi Valley Landfill (California Class III) located in Simi Valley, California;
- Chiquita Canyon Landfill (California Class III) located in Castaic, California;
- US Ecology Landfill (Subtitle C with TSCA permit, with VOC treatment processes to meet Land Disposal Restrictions, if necessary) located in Beatty, Nevada.

The one-way distance within the South Coast Air Basin (SoCAB) to each of these landfills, except Olinda Alpha, is 60 miles. For purposes of emissions estimates, it was assumed that all truck trips would be 120 miles round trip. Therefore, any trips to Olinda Alpha, which is seven miles from the project site, would have less emissions than estimated.

[1] Additional emissions were estimated for concurrent demolition activities; the demolition that occurred concurrently with remediation has been completed.

Haul truck emissions were estimated using the California Air Resources Board EMFAC2011 emission factors. The primary purpose of the estimate is to determine the maximum number of daily truck trips that could occur within the 100 pound per day NOx emission limit. Emissions were estimated for two scenarios: (1) If no additional construction equipment is used for soil excavation, stockpiling, and loading beyond that assumed in the IS/MND; and (2) if the amount of on-site construction equipment is doubled in order to accelerate the remediation process.[2] The calculations are shown in Attachment 3.1 and include emissions data for the other criteria pollutants in addition to NOx.

The results are as follows:

(1) If no additional construction equipment is used for soil excavation, stockpiling, and loading, a limit of 30 round trips per day for hauling would result in estimated NOx emissions of 93 pounds per day, which is less than the 100 pounds per day significance threshold.

(2) If the amount of on-site construction equipment is doubled in order to accelerate the remediation process, a limit of 17 round trips per day for hauling would result in estimated NOx emissions of 94 pounds per day, which is less than the 100 pounds per day significance threshold.

For either scenario, the NOx emission rate would be less than significant and no new mitigation measures are required.

Greenhouse Gas Emissions

Because the City has a Climate Action Plan (CAP) that meets the requirements of CEQA Guidelines Section 15183.5, the determination of whether a project would generate GHG emissions that may have a significant impact on the environment, or conflict with an applicable plan, policy or regulation adopted for the purpose of reducing GHG emissions, is made by determining the consistency of that project with the CAP. As stated in the IS/MND, the proposed project would not result in any growth within the City of Fullerton including an increase in employment or population. Therefore, the proposed project is consistent with The Fullerton Plan's year 2030 growth projections and would be consistent with the CAP resulting in a less than significant impact related to GHG emissions. The proposed changes to the project for the removal of PCB-impacted soils would not change that determination, and the GHG emissions impacts would remain less than significant.

For information it is noted that project GHG emissions were estimated in the IS/MND at 1,812 metric tons of carbon dioxide equivalent ($MTCO_2e$). GHG emissions were estimated for the proposed PCB-impacted soil excavation and hauling. For these calculations it was assumed that 25 percent of the haul trips would be to Beatty, Nevada with a round trip distance of 582 miles and the remainder of the trips would be 120 miles round trip. The proposed changes to the project would generate an estimated additional 1,114 $MTCO_2e$ for a total of 2,926 $MTCO_2e$.

[2] The on-site equipment assumed for the current remediation effort is one excavator, one rubber-tired loader, and one off-highway truck, all operating for 20 hours per day.

ATTACHMENT 3.1

AIR QUALITY AND GHG EMISSIONS CALCULATIONS

Criteria Pollutant Emissions with Extra On-Site Equipment						
	Emissions (lbs/day)					
Source	ROC	NOX	CO	SOX	PM10	PM2.5
Mobile Sources	5	29	26	0	1	1
Earthwork	0	0	0	0	3	1
Soil Storage Piles	0	0	0	0	14	3
EDU Operation	14	0	0	0	1	0
Total	20	29	26	0	19	5
Additional Mobile Sources	5	29	26	0	1	1
17 Daily Haul Truck Trips	1	36	7	0	1	1
Total	26	94	59	0	21	7
Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

Criteria Pollutant Emissions without Extra On-Site Equipment						
	Emissions (lbs/day)					
Source	ROC	NOX	CO	SOX	PM10	PM2.5
Mobile Sources	5	29	26	0	1	1
Earthwork	0	0	0	0	3	1
Soil Storage Piles	0	0	0	0	14	3
EDU Operation	14	0	0	0	1	0
Total	20	29	26	0	19	5
30 Daily Haul Truck Trips	2	64	12	0	2	1
Total	22	93	38	0	21	6
Threshold	75	100	550	150	150	55
Exceed Threshold?	No	No	No	No	No	No

Beckman Coulter, Inc. Fullerton Facility PCB Hauling

GHG Emissions	
Source	Emissions (MTCO2e/yr)
Remediation Mobile Sources	934
Remediation Electrical Use	720
Demolition	158
Total	1,812
Additional Mobile Sources	934
Haul Trucks	180
Total	2,926

Total Round Trips	430

Beckman Coulter, Inc. Fullerton Facility PCB Hauling
Daily Criteria Pollutant Hauling Truck Emissions

Year	2014
Daily Trips	30
Roundtrip Distance	120
Daily VMT	3,600

Grams per Trip Emission Factors

ROC	NOX	CO	SOX	PM10	PM2.5
0.52	5.80	2.78	0.01	0.03	0.03

Grams per Mile Emission Factors

ROC	NOX	CO	SOX	PM10	PM2.5
0.30	8.03	1.49	0.02	0.25	0.17

Trip Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
0.03	0.38	0.18	0.00	0.00	0.00

VMT Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
2.37	63.77	11.80	0.13	1.97	1.39

Total Haul Truck-Related Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
2.41	64.15	11.98	0.13	1.97	1.39

grams/lb 453.5925

Beckman Coulter, Inc. Fullerton Facility PCB Hauling
Daily Criteria Pollutant Hauling Truck Emissions

Year	2014
Daily Trips	17
Roundtrip Distance	120
Daily VMT	2,040

Grams per Trip Emission Factors

ROC	NOX	CO	SOX	PM10	PM2.5
0.52	5.80	2.78	0.01	0.03	0.03

Grams per Mile Emission Factors

ROC	NOX	CO	SOX	PM10	PM2.5
0.30	8.03	1.49	0.02	0.25	0.17

Trip Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
0.02	0.22	0.10	0.00	0.00	0.00

VMT Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
1.34	36.13	6.68	0.07	1.11	0.79

Total Haul Truck-Related Emissions (lbs/day)

ROC	NOX	CO	SOX	PM10	PM2.5
1.36	36.35	6.79	0.07	1.12	0.79

Beckman Coulter, Inc. Fullerton Facility PCB Hauling
Annual Greenhouse Gas Hauling Truck Emissions

Year	2014
Total Trips	430
Roundtrip Distance	245
Total VMT	105,135

	CO2e
Grams per Trip Emission Factors	576.70
Grams per Mile Emission Factors	1,707.18
Trip Emissions (MT/yr)	0.25
VMT Emissions (MT/yr)	179.48
Total Haul Truck-Related Emissions (MT/yr)	179.73

grams/lb 453.5925

	one-way		
brea	7		
simi	65		
chiquita	66	0.75	49.5
nevada	291	0.25	72.75
			122.25

EMFAC2011 Emission Rates
Region Type: County
Region: Orange
Calendar Year: 2014
Season: Annual
Vehicle Classification: EMFAC2007 Categories

Region	CalYr	Season	Veh_Class	Fuel	MdlYr	Speed	Population	VMT	Trips	ROG_RUNI	ROG_IDLE	ROG_STRE	ROG_DIUR	ROG_HTSK	ROG_RUNI	ROG_REST	TOG_RUNI	TOG_IDLE	TOG_STRE	TOG_DIUR	TOG_HTSK	TOG_RUNI	TOG_REST	CO_RUNEX
						(miles/hr)	(vehicles)	(miles/day	(trips/day)	(gms/mile)	(gms/vehic	(gms/vehic	(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/mile)	(gms/vehic	(gms/vehic	(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/mile)
Orange	2014	Annual	T7	GAS	Aggregate	Aggregate	184.3884	23306.46	3689.242	0.728207	0	60.50362	0.072661	4.453364	0.127316	0.048103	0.852529	0	64.91954	0.072661	4.453364	0.127316	0.048103	27.51734
Orange	2014	Annual	T7	DSL	Aggregate	Aggregate	7075.977	993968.8	0	0.298733	10.02403	0	0	0	0	0	0.340084	11.41159	0	0	0	0	0	1.486226

CO_IDLEX	CO_STREX	NOX_RUNI	NOX_IDLE	NOX_STRE	CO2_RUNE	CO2_IDLEX	CO2_STRE	CO2_RUNE	CO2_IDLEX	CO2_STRE	PM10_RUI	PM10_IDLI	PM10_STR	PM10_PM	PM10_PMI	PM2_5_RU	PM2_5_ID	PM2_5_ST	PM2_5_PM	PM2_5_PM	SOX_RUNE	SOX_IDLEX	SOX_STREX
(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/vehic	(gms/mile)	(gms/vehic	(gms/vehic	(gms/mile)	(gms/mile)	(gms/mile)	(gms/vehic	(gms/vehic	(gms/mile)	(gms/mile)	(gms/mile)	(gms/vehic	(gms/vehicle/day)
0	1403.105	4.868004	0	83.33919	580.2855	0	1420.74	571.5812	0	1399.429	0.000771	0	0.125981	0.008	0.03675	0.000668	0	0.099963	0.002	0.01575	0.006249	0	0.038121
51.54429	0	8.034582	73.02449	0	1733.18	10414.79	0	1707.182	10258.57	0	0.152077	0.453207	0	0.035288	0.06052	0.139911	0.41695	0	0.008822	0.025937	0.016535	0.099362	0

CY	EMFAC200	Fuel_Type	air_basin	season	HC (g/hr-v	CO (g/hr-v	NOX (g/hr	PM10 (g/h	PM2.5 (g/	CO2 (g/hr·	CO2 (with	TOG (g/hr	ROG (g/hr	Sox (g/hr-veh)
2014	HHDT	D	SC	a	4.948574	33.3607	69.56009	0.33314	0.306489	7025.821	6920.433	7.134359	6.266874	0.06703

ATTACHMENT 4

NOISE IMPACT ANALYSIS
FOR EXCAVATION AND REMOVAL OF PCB-IMPACTED SOIL
FOR THE BECKMAN COULTER FACILITY

NOISE IMPACT ANALYSIS FOR EXCAVATION AND REMOVAL OF PCB-IMPACTED SOIL FOR THE BECKMAN COULTER FACILITY

Beckman Coulter Inc. (BCI) (Project Applicant) proposes to excavate, test, segregate, and remove polychlorinated biphenyl (PCB) impacted soil from the project site at the southeast of the corner of North Harbor Boulevard and Lambert Road in the City of Fullerton, Orange County, California. On-site remediation of non-PCB-impacted contaminated soil is continuing at the project site as originally proposed. The initial remediation plan assumed that offsite disposal of 40 cubic yards (CY) of PCB-impacted soil would be required (2 round trips). Discovery of greater quantities of PCB-impacted soil than anticipated from initial testing requires that more PCB-contaminated soils be disposed of off-site. The Project Applicant now proposes to excavate and remove approximately 16,000 tons (11,000 CY) of PCB-impacted soil, resulting in approximately 426 truck trips (round trips) more than analyzed in the IS/MND. Additionally, the Project Applicant has determined that the operation of more excavation and soil handling construction equipment may be needed compared to what was analyzed in the IS/MND. The Project Applicant is requesting a revision to the project which would allow for an increase in truck trips and/or onsite construction equipment. It is not anticipated that more than 20 round trips would be required on any given day. However, this analysis has been prepared based on a maximum of 30 round trips daily (a limit imposed by air quality considerations) without resulting in a significant noise impact.

The following mitigation measure (MM) identified in The Fullerton Plan EIR was incorporated as part of the project and would be applicable to the proposed changes to the project. This MM is included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM N-2 Project applicants shall require by contract specifications that heavily loaded trucks used during construction would be routed away from residential streets to the extent feasible. Contract specifications shall be included in construction documents, which shall be reviewed by the City prior to issuance of a grading permit.

The following additional MM from the IS/MND has been incorporated into the project and would be applicable to the proposed changes to the project. This MM is included in the Mitigation Monitoring and Reporting Program for the proposed project.

MM NSE-1 If remediation activities occur between the hours 10:00 and 7:00 AM on a weekday, or on a Sunday or a City-recognized holiday, operation of diesel powered construction equipment outdoors shall be limited to one piece of equipment at one time, such as a loader or backhoe. The maximum noise level of the equipment shall not exceed 80 dBA at a distance of 50 feet. This requirement shall be stated in the project specifications. The City Building Official shall be responsible for ensuring that the contractor complies with these requirements during remediation.

Additional construction equipment and haul trucks operating on the site during daytime hours may increase noise levels by up to 3 dBA. Daytime construction noise is exempt from quantitative limits of the Fullerton and La Habra noise ordinances. Noise levels at the nearest sensitive receptors, approximately 1,400 feet north from the center of the project site, may increase from an average hourly noise level (Leq) of 57 dBA to 60 dBA Leq. As described in the IS/MND, construction equipment noise may be noticeable at the sensitive receptors, or the noise may be

masked by traffic noise on Lambert Road, Harbor Boulevard, and Superior Avenue. The noise increase would not be substantial and would be less than significant.

Noise from nighttime remediation activity would not change with the proposed changes to the project because of the limitations of MM NSE-1. There would be no impact.

As described in the IS/MND, trucks and contractors are anticipated to access the project site via Harbor Boulevard, and Imperial Highway. These roads have high volumes of vehicle and truck traffic, more than 32,000 trips per day). A doubling of traffic volumes would increase traffic noise levels by 3 dBA, which would be barely perceptible. The proposed increased hauling of PCB-impacted soils could generate up to 60 one-way trucks trips per day; the increase in traffic noise on these high-volume roadways would be negligible.

The noise impact of the proposed project changes would be less than significant and no new MMs are required.